



Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary

**2026 SESSION
POSITION PAPER**

BILL NO.: House Bill 520 – State Board of Physicians – Naturopathic Doctors – Scope Of Practice, Renewals, and Professional Liability Insurance
COMMITTEE: Health
POSITION: Letter of Concern

The Maryland Board of Pharmacy respectfully submits this Letter of Concern for House Bill (HB) 520 – State Board of Physicians – Naturopathic Doctors – Scope of Practice, Renewals, and Professional Liability Insurance. HB 520 expands the scope of practice to enable a Naturopathic Doctor to prescribe any prescription drug, and to prescribe controlled dangerous substances in accordance with an approved formulary.

The Board is concerned about the broad expansion of scope authorized by this bill with respect to prescribing authority, including the prescribing of controlled dangerous substances. The Board does not believe that the education in pharmacology that currently exists in the core curriculum for naturopathic doctors is not substantially similar or equivalent to that of medical prescribers. This bill would enable a naturopathic doctor to prescribe medications with a narrow therapeutic index, such as blood thinners, heart medications, thyroid medications, psychiatric medications, or any other prescription drug. In addition, the proposed removal of the jointly developed formulary for non-CDS further adds to the Board’s concern that this proposed expansion would put the health and safety of Maryland citizens at risk.

Thank you for your consideration. For more information, please contact Julie Gaskins, Legislative Liaison at the Maryland Board of Pharmacy, at (410) 764-4709.

Sincerely,

Deena Speights-Napata -MDH-

Deena Speights-Napata
Executive Director

The opinion of the Board expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.