

Chairman Huffman, Vice Chair Johnson, Ranking Member Antonio, and members of Senate Health Committee, thank you for the opportunity to provide my personal opponent testimony on House Bill 73.

My name is Kembral Nelson, and I am a board-certified pharmacist practicing as a Pharmacy Medication Safety and Compliance Administrator in a pediatric hospital. With over 10 years of healthcare experience and more than seven years as a licensed pharmacist in Ohio, I am deeply committed to the health and safety of my patients. I am writing to share my strong opposition to House Bill 73, which I believe will compromise the safety of Ohio's patients, particularly the vulnerable populations I serve.

The COVID-19 pandemic challenged healthcare systems worldwide, forcing hospitals to adapt rapidly under unprecedented circumstances. While some practices implemented during this time were not ideal, they reflected the need to act swiftly to protect patients and staff. These experiences provided valuable lessons, highlighting both successes and areas for improvement in our healthcare delivery. However, House Bill 73 risks creating more harm than good by dismantling essential safeguards that protect patients. Instead of building on the progress made and addressing gaps exposed by the pandemic, this bill introduces policies that compromise patient safety, fragment care, and undermine the trust placed in healthcare professionals.

### **Misguided Focus on Off-Label Prescribing**

House Bill 73 mandates pharmacists to dispense any off-label prescription, regardless of safety concerns. This is not about expanding access to off-label prescribing, which is already a well-established and common practice, especially in pediatrics. Instead, this bill strips pharmacists of their ability to use clinical judgment to prevent harm.

As a pediatric pharmacist, I regularly dispense medications off-label because many drugs lack pediatric-specific studies prior to drug approval by the Food and Drug Administration. However, this is done thoughtfully, with safety and evidence guiding every decision. By requiring pharmacists to dispense any off-label prescription without question, the bill removes vital patient protections.

#### **Examples of potential harm include:**

- Dispensing a drug known to cause seizures to a patient with epilepsy.
- Filling a prescription that interacts dangerously with other medications the patient is taking.
- Providing medications at doses that are toxic, especially to children, pregnant patients, and older adults.

The bill forces pharmacists into an ethical dilemma: either comply with a harmful mandate or uphold their duty to protect patients. This conflict could lead to dangerous outcomes for Ohioans.

### **Fragmentation of Interdisciplinary Care**

House Bill 73 threatens the collaborative, team-based approach that is the cornerstone of high-quality care in specialized fields like pediatrics. Effective care for children requires coordination among a team of experts, including physicians, pharmacists, and other healthcare providers, all of whom bring specialized knowledge and training to the table.

By allowing external providers to gain temporary privileges and make isolated decisions, the bill creates silos in care, leading to:

1. Communication breakdowns during critical moments, such as acute medical events.
2. Conflicting medication decisions that may jeopardize patient safety.

Pediatrics is far more than "mini-adult" care—children's growth and development profoundly impact medication prescribing, requiring careful consideration of their age, weight, body surface area, and the maturity of their organ functions. Fragmenting care by bypassing established interdisciplinary teams risks errors and poor outcomes, particularly for our most fragile patients.

### **Pharmacists as the Last Line of Defense**

Pharmacists play a vital role in preventing medication-related harm, often serving as the last line of defense. House Bill 73 removes our ability to object to dispensing medications on scientific or ethical grounds. This erodes our ability to act in the best interests of patients and protect them from inappropriate or unsafe prescribing.

For instance, pharmacists would be required to dispense medications:

- Without necessary lab results to confirm safety.
- Known to cause significant harm, such as low blood pressure, internal bleeding, or organ failure.
- For uses with no proven benefit, adding unnecessary risk without clear patient advantage.

This sweeping requirement ignores the nuanced decision-making that is central to safe pharmacy practice. It also disregards the lessons of the opioid epidemic, where unchecked prescribing practices contributed to widespread harm. Thoughtful medication stewardship is vital for the long-term health of Ohio's patients and communities, but House Bill 73 disregards these principles.

### **Conclusion**

House Bill 73 removes vital pharmacist protections, fractures specialized multidisciplinary care, and introduces serious risks to patient safety and medication stewardship. It places Ohio patients—especially our most vulnerable populations—at significant risk of harm.

As a pharmacist, I am committed to ensuring safe, effective, and appropriate use of medications. This bill undermines that commitment and endangers the patients we are entrusted to protect.

Thank you for considering my testimony and for your attention to this critical matter. I respectfully urge you to oppose House Bill 73 and preserve the integrity of Ohio's healthcare system.

Sincerely,



**Kembral Nelson, PharmD, MS, BCSCP, CMQOE**  
Pharmacy Medication Safety and Compliance Administrator