

## Representative Olson,

We, the Board of Directors at Tanana Valley Clinic, are writing in opposition of House Bill 282. While we find the specific treatments that naturopathic doctors provide patients valuable, we do not support any expansion of a naturopath's scope of practice, specifically the designation as a 'primary care physician.'

HB282 proposes that naturopaths are allowed to write and administer prescriptions, perform minor surgeries, and enable full primary-care practices for naturopathic doctors. However, it does not take into account the distinct differences between the education and training of an MD or DO, and a naturopath. This new bill would allow naturopaths to practice well beyond the scope of their education. To earn his or her degree, an MD or DO must attend a rigorous four-year medical school, perform a *required* 3-5 year residency, oftentimes complete a 3-5 year fellowship, and pass multiple boards; a naturopath completes a four-year program at a naturopathic medical college – many of which are offered online – and passes a licensing exam, with an *optional* residency program for a specialty. The difference between these two educational backgrounds is distinct, in both quantifiable time requirements and practical experience. Allowing the recipients of both degrees to practice under the same title – 'primary care physician' – is not only inappropriate but erroneous.

This bill also puts forward a state-authorized prescription endorsement; it is our opinion that this is not in the best interest of patients. Sixty hours of pharmacology education is not a sufficient amount of training to earn prescribing rights, and will allow naturopaths to practice beyond their scope. Many states whose licensed naturopaths have prescriptive rights limit their abilities (see attachment). We believe that these limits are indicative of proactive checks and balances that recognize naturopaths' lack of prescription training, and prevent them from causing potential harm to patients. These limitations should be considered before granting Alaska's naturopaths prescribing rights under HB282.

Alaska may be facing a shortage of primary care physicians, but filling these positions with under-qualified naturopaths is not the answer. Patients in Alaska have a deserved expectation



that when they visit a 'physician,' they are being seen by someone with extensive medical training and expertise. Ultimately, the training received by both bodies of providers is not the same; allowing naturopaths to have prescribing rights, perform minor surgeries, and be called 'primary care physicians' would allow them to practice beyond their scope, endangering patients and devaluing MDs and DOs. We strongly urge you to consider our concerns, and oppose HB282.

Sincerely,

Mishelle Mace, MD

Chairman of the Board

Todd Capistrant, DO

Board Member

J. Timothy Foote, MD

Board Member

James Shill, MBA

CEO, Tanana Valley Clinic

Clay Triplehorn, DO

Board Member

Hunter Judkins, MD

CMO, Tanana Valley Clinic