

March 11, 2011

Representative Kurt Olson
Chair, Labor and Commerce Committee
State Capitol, Rm 24
Juneau, AK 99801-1182

Representative Olson,

We, the Board of Directors at Tanana Valley Clinic, are writing in opposition of House Bill 122. While we find the specific treatments that naturopaths provide to patients valuable, we do not support any expansion of a naturopath's scope of practice and have serious concerns regarding the formation of an independent naturopathic board.

HB 122 aims to establish an Alaska Naturopathic Medical Board and expand the allowed practices and procedures of naturopaths. However, it does not take into account the distinct differences between the education and training of a doctor of osteopathy or a doctor of medicine, and a naturopath.

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, and pass one or more boards depending on specialty. A naturopath completes a four-year program at a naturopathic medical college and passes a licensing exam, with an *optional* residency program for a specialty. Standard requirements for naturopathy residency curriculum, rotations, or experiences do not exist.

The difference between these two educational backgrounds is distinct, in both quantifiable time requirements and practical experience. For instance, naturopathic schools may be four years in length, but the direct patient care is only 10% of that of an MD or DO (total patient care hours for physicians is 12,000-16,000 hours).


HB 122 would also allow naturopaths to: conduct physical examinations; order or conduct medical imaging and laboratory examinations; perform and administer therapies including intravenous delivery of dietetic substances; perform pre-employment, school and workplace health examinations and administer and prescribe prescription drugs, vaccines, hormones and medical devices.

We believe that the current level of education and training for naturopaths is inadequate to justify the increase in scope of practice that this new bill proposes.

By allowing naturopaths to use the title “physician” or “doctor”, HB 122 also creates ambiguity where it does not exist. This is misleading and confusing to the public. 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.


We strongly urge you to consider our concerns, and oppose HB 122. Alaska may be facing a shortage of primary care physicians, but filling these positions with under-qualified naturopaths is not the answer.


Sincerely,

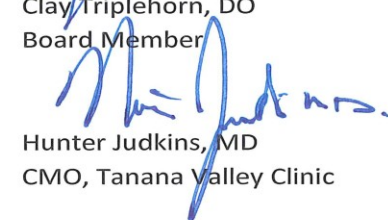

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