

# House Bill 91, Naturopathic Medicine Reform: Concerns and Answers

***Concern: What would be permitted as a “minor office procedure?”***

Our legislative proposal would allow naturopathic doctors to suture minor wounds, obtain superficial biopsies, insert and remove IUDs, and perform other low-risk superficial minor surgical procedures. We exclude general or spinal anesthetics, major surgery, surgery of the body cavities, plastic surgery, surgery involving the eyes, or surgery involving tendons, ligaments, nerves, or blood vessels.

***Concern: Do naturopathic doctors have adequate training for prescription writing?***

Naturopathic doctors have more than 140 hours of pharmacology training through both specific pharmacological coursework and systems based coursework (e.g. gastroenterology, neurology, etc.). This training is equivalent to or exceeds that of other healthcare providers in Alaska who currently hold prescriptive privileges. Pharmacology is included in the standard training of all accredited naturopathic schools.

***Concern: Are there adequate limits to the scope of practice in the proposed legislation?***

The proposed legislation only grants rights to practice in naturopathic doctors’ accredited scope. This *does not* include surgeries beyond those to the superficial systems, specifically limited to "surgical repair and care of superficial lacerations and abrasions, superficial lesions, and the removal of foreign bodies located in the superficial tissues of the human body." Practically speaking, this means wart removal, sutures, and like treatments, all of which are part of the naturopathic doctor’s training.

Additionally, the prescriptive rights in the proposed legislation do *not* extend to controlled substances or cancer treatment drugs.

***Concern: Are Naturopathic Doctors Anti-Vaccine?***

In Alaska, naturopathic doctors do not currently have the legal right to administer immunizations. As a result, we cannot point to our own work as evidence of our support for routine immunizations for the betterment of public health. However, the Naturopathic Academy of Primary Care Physicians has [adopted a clear position endorsing the CDC immunization schedule](#). This is consistent with our training and ideal practices. Among other things, the position clearly states that:

*Naturopathic physicians are strong advocates of preventive medicine and protecting children and adults from adverse consequences of infectious disease, and therefore immunization is included under the naturopathic precept of Prevention. Naturopathic physicians are morally obliged and legally mandated to carry out public health laws including those with respect to immunization.*

As is the case for any medical practice, some patients who seek care from naturopathic doctors may have personal opinions that differ from the medical recommendations on immunizations. However, those are not consistent with or endorsed by the standards of our profession.

***Concern: Naturopathic doctors are at risk for malpractice suits***

Malpractice claims and disciplinary actions against naturopathic doctors are extremely rare, both within Alaska and nationwide. According to the National Practitioner Data Bank compilation report from 1990-2010, there were only 16 malpractice claims brought against naturopathic doctors nationally in that period.

Similar evidence comes from costs for malpractice insurance, which are much lower for naturopathic doctors than for conventional medical doctors.

***Concern: Given the focus on lifestyle and diet, why would NDs need prescriptive privileges?***

There are many instances when pharmaceuticals are important to the health and wellbeing of patients, regardless of the focus of the care model. Antibiotics may be needed for an infection that does not respond to non-medication approaches. Women getting their annual exams often need renewed birth control prescriptions. Or, in the case where a patient makes progress on a chronic condition through diet and lifestyle modification (e.g. diabetes, hyperlipidemia, hypertension, etc.), they may require lower doses of prescriptions that they are already taking. In all of these examples, allowing NDs to prescribe medications removes the need for duplicative appointments in order to access prescriptions.

***Concern: Naturopathic doctors get mail-order training in overseas or sub-standard institutions***

Any applicant for licensure in Alaska must have a degree from a naturopathic medical school, accredited by the Council on Naturopathic Medical Education, the accreditation body recognized by the U.S. Department of Education. There are 7 accredited institutions in the United States. All accredited naturopathic medical schools are four-year programs.

As with other licensed professionals, NDs have had to defend their profession against misappropriation. Online programs have previously existed that grant the title of “naturopath” to unlicensed individuals with limited training. However, these individuals are not candidates to sit for board certification and are not included in the provisions of our legislation, which strictly addresses licensed naturopathic doctors.

***Concern: Residencies are not a requirement of naturopathic training***

Residencies are not requirements of naturopathic certification, though many naturopathic doctors do now participate in optional one-year residency programs. Residencies are also not required for other independent primary care practitioners who hold prescriptive privileges in Alaska, such as nurse practitioners and physicians assistants.

Naturopathic residencies have been less common because naturopaths are not trained to be hospitalists. As a result residencies are not a requirement in most states, and costs are not covered by federal programs. Relative weighting of clinical rotations in the third and fourth years of medical school ensure that graduating naturopathic doctors have significant clinical experience with patients.