

Alaska State Medical Association

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April 29, 2019

Representative Gabriel LeDoux, Co-Chair
House Labor and Commerce Committee
State Capitol, Room 403
Juneau, Alaska 99801

Representative Adam Wool, Co-Chair
House Labor and Commerce Committee
State Capitol, Room 412
Juneau, Alaska 99801

Re: HB 91 – Naturopaths; Licensing

Dear Co-Chairs LeDoux and Wool:

The Alaska State Medical Association (ASMA) represents physicians statewide and is primarily concerned with the health of all Alaskans.

ASMA opposes HB 91 and any expansion of naturopath's scope of practice beyond that which is currently found in AS 08.45.

Naturopaths essentially wish to have the same scope of practice as Primary Care Physicians (MDs and DOs). Naturopaths' education and training simply do not have comparable depth and breadth as that of an MD or DO and is inadequate for the expansion of scope contained within HB 91. The American Medical Association in its AMA Scope of Practice Data Series Naturopaths 2018 stated it very clearly:

The AMA recognizes that patients' access to care is a legitimate concern in the United States. However, actual or perceived workforce shortages in the medical profession cannot and should not be solved by exposing patients to health care providers whose education or training does not support the caregiving role they seek. Scope of practice expansions that are misaligned with practitioners' education and training are unlikely to be in the best interests of patients.

ASMA understands the difficulty legislators are faced with when attempting to compare appropriate education and training for healthcare providers. However, it is critical to ensure appropriate licensing and definition of scope of practice as your decisions will communicate to patients an endorsement of the scope of practice and can result in patients being put in dangerous situations. Patient safety should be paramount.

Education:

First and foremost, it is important to note that a naturopathic education is at its foundation based on Naturopathic theory and based on the healing power of nature where nature heals through the response of the life force. So even courses that share a similar name or topic are taught from a different perspective.

Primary Care Physicians attend four years of medical school followed by three years of residency in an accredited residency program.

It is in the residency training where the physician really learns all aspects of patient care with hands-on experience in both the outpatient and inpatient (in hospital) settings. Compare the American Academy of Family Physicians required 3-year residency program for a Family Physician to the 1-year **optional** residency program for naturopaths. The hours respectively, are 9,000 to 10,000 versus 535 to 1,035. Furthermore, as few states allow prescriptive authority for naturopaths the optional residency may lack training in use of pharmaceuticals.

ASMA would suggest that if you need more information about Family Medicine residency programs you contact Harold Johnston, MD, who heads Alaska's own Family Medicine program.

State Oversight:

There currently is no Board overseeing the naturopathic practices. Currently, employees of the Department of Commerce review and act on complaints against naturopaths. Up to this point naturopaths have been limited to traditional naturopathic practice which makes it fairly easy for state employees with little to no health care experience to regulate naturopaths. However, with the significant expansion of scope of practice to include surgeries, prescription of drugs, and use of poisons on patients it is wholly inappropriate for state employees to make determinations on the increased scope of practice. Under this scenario the actual scope of practice will be set by individual naturopaths.

Immunizations. While we are confident that many naturopaths do support vaccination there are studies that raise concerns over vaccination rates from patients seeing naturopaths.

In February 2011 Alaska's Department of Health and Social Services released a bulletin with news that Alaska is now near the bottom in rates of childhood immunizations, based on a national survey done by the US Centers for Disease Control and Prevention (CDC). Alaska is 49th among all states, with a rate of immunizations of 56.6% compared with the national average of 70.5%. A University of Washington study reported in 2009 in the Maternal and Child Health Journal ("Pediatrics Vaccination and Vaccine Preventable Disease Acquisition: Associations with Care by Complementary and Alternative Medicine Providers," Volume 14, Number 6, 922-930, DOI: 10.1007/s10995-009-0519-5): *"Children were significantly less likely to receive each of the four recommended vaccinations if they saw a naturopathic care."* Furthermore it stated *"Children aged 1-17 years were significantly more likely to be diagnosed with vaccine preventable disease if they received naturopathic care."* It would seem that if the naturopathic standard of care for children does not include recommendations for parents to have their kids vaccinated for preventative illnesses, there is a gap in their knowledge base. Are there other gaps in naturopaths' standard of care for children?

ASMA will oppose bills such as HB 91 that expand the scope of practice for naturopaths beyond what is currently allowed in AS 08.45 until:

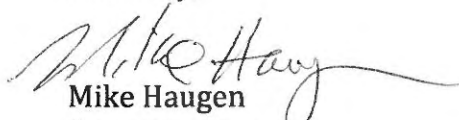
- (1) The U.S. and Canadian schools of naturopathy that grant doctoral degrees are accredited by the same accrediting bodies for the U.S. and Canadian medical schools: Liaison Committee on Medical Education (LCME) or the American Osteopathic Association (AOA), Commission on Osteopathic College Accreditation (COCA);
- (2) All candidates for admission to U.S. and Canadian schools of naturopathy are required to take the medical College Admission Test (MCAT);
- (3) All graduates of U.S. and Canadian schools of naturopathy pass all three steps/levels of the United States Medical Licensing Examination (USMLE) or the Comprehensive Osteopathic Medical Examination (COMLEX – USA), using the same passing criteria as the MDs or DOs, respectively;
- (4) All naturopaths seeking licensure must successfully complete at least a three-year residency program that is accredited by the same accrediting body, Accreditation Council for Graduate Medical Education (ACGME), for MDs and AOA-approved residency programs for DOs;
- (5) All naturopaths are subject to the same standard of care criteria as MDs and DOs for licensing sanction actions and in litigation, including allegations of malpractice;
- (6) All naturopaths are required to report to the state the outcome of each malpractice or action for which damages have been or are to be paid, whether by judgment or settlement; and
- (7) The state reports all actions against a naturopath to the National Practitioner Data Bank.

Such requirements are appropriate to protect the public.

ASMA believes that patient safety and public health trump all other considerations – even workforce shortages. Additionally, ASMA feels that the Legislature in evaluating HB 91 and other issues involving scope of practice needs to adopt the judiciary's highest standard of proof – that the extension of the increased scope of practice beyond a reasonable doubt will provide for the public's safety.

ASMA urges you to oppose HB 91 and any other measure to expand the naturopath's scope of practice beyond that which currently exists in AS 08.45.

Sincerely,


Mike Haugen
Executive Director
Alaska State Medical Association

cc: House Labor and Commerce Committee Members

Index for NEW Opposition Letters HB 91 as of May 3

1. Jennifer Meyer
2. Robert Nethken
3. Randy Lewis
4. Laurie Montano
5. Kristin Mitchell
6. John Finley
7. Michelle Laufer
8. Phyllis Kiehl
9. Dwight Ellerbe
10. Mary Ann Foland
11. Katherine Hardy
12. Corrine Leistikow
13. Nate Buffington

Ashley Strauch

From: Robert Nethken [REDACTED]
Sent: Friday, April 19, 2019 5:20 PM
To: House Labor and Commerce
Subject: HB91

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,

I do not support HB91 as I have not had a positive encounter with my local naturopath.

I do not support this bill because in late 2018 I went to a local naturopath in Fairbanks for help coping with stress and anxiety, where a blood draw was done and sent to Labcorp for testing. Labcorp ran my tests as a female (I am a male) and notified the naturopath I was seeing, who notified me that I needed to see a physician immediately. It was only after additional medical expenses were incurred at another provider did I find out that my tests results were skewed and there was no emergency. When I contacted my naturopath about this issue, and the financial burdens placed upon me by Labcorp, I was met with evasive answers and outright refusal to help.

My point is the referring naturopath did not properly read my test results in their entirety which I view as a failure of Section 6 of HB91. If my naturopath cannot take the time to fully read, and potentially spot mistakes, in an accredited testing facilities' report I do not believe they are fulfilling their public health duties. And this is why I do not support this bill.

- R. Nethken

Ashley Strauch

From: Alfred Randolph Lewis [REDACTED]
Sent: Monday, April 22, 2019 10:18 AM
To: House Labor and Commerce
Subject: HB91

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Representatives,

I do not support increased scope of services for Naturopathic doctors and neither does my insurance company (Heath Care Exchange plan: HSA Silver (BSBC)). Unless and until there are double blind studies that their remedies improve health, naturopaths should not be granted additional status.

Sincerely,

Randy Lewis, LCSW

FLT LLC
Randy Lewis, LCSW
~~Ph: (907) 457-1128~~
~~Cell: (907) 457-1128~~
~~Fax: (907) 457-1128~~

Practice location: 250 Cushman St. in the Courthouse Square, Suite 4F

~~Mailing address: 250 Cushman St. Suite 4F, Anchorage, AK 99501~~
~~Practicing in AK 99501~~

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Ashley Strauch

From: laurie montano [REDACTED]
Sent: Wednesday, April 24, 2019 11:33 AM
To: Deneen Tuck
Subject: HB 91 opposition

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Anchorage Representatives,

I am writing to oppose HB 91 which expands the scope of practice of naturopathic doctors.

I am an internal medicine physician and pediatrician and this scares me. I have a two physician practice in Anchorage and see patients of all ages from newborn to elderly. I have been practicing here for almost 17 years. I have seen many instances where a naturopathic medicine physician (an MD - there is one in Anchorage) and nurse practitioners have prescribed medications that have caused harm. I will explain two of those situations in detail.

One was a woman who was diagnosed by the naturopathic MD with an underlying inflammatory process that was not science based and was subjected to a year of IV antibiotic treatment that was not medically appropriate or necessary. She had complications from this such as ongoing yeast infections. The cost to her and to her insurance company must've been enormous.

Another more common problem I see is naturopathic providers prescribing thyroid medication for patients who do not need it. This has caused two of my patients to develop anxiety, panic attacks and heart palpitations. This can progress to dangerous irregular heart rhythms.

I see naturopathic doctors doing many unnecessary labs and prescribing medications that are not appropriate or science based. If we want to control the cost of our health care, this is not the way forward.

Please oppose this bill. I will be giving telephone testimony on May 3 as well, and please call me with any questions you have about this.

Thank you for your time,

Laurie Montano, MD

[REDACTED]

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Laurie Montano Alderson

I am writing to oppose HB 91, the proposed expansion of the scope of practice for naturopaths. I will be at a state-wide annual continuing medical education meeting on May 3, so I will be unable to testify in-person or by phone on the date of the hearing.

As an internal medicine physician, board certified by the American Board of Internal Medicine, I have strong objections to expanding the scope of practice for individuals with insufficient training to understand the risks and benefits of scientific medical therapies. Over my twenty years in practice in Alaska, I have encountered numerous incidents of patient harm caused by medical advice which does not meet the standard of care.

Due to patient confidentiality regulations, I cannot provide full patient-specific details, but I have seen many cases of injury to patients by naturopaths. Here are a few representative examples:

- A patient who was over-treated with 'natural' thyroid supplements who suffered the serious cardiac complication of atrial fibrillation as a predictable consequence.

- A patient with a disorder that predisposed them to blood clot formation who was advised by their naturopath to stop their anticoagulation medication in favor of a 'natural' alternative, and subsequently suffered a large stroke. In my professional opinion, this stroke was preventable, had the patient continued their effective, medically prescribed anticoagulant.

- A case of life-threatening toxic shock syndrome caused by intravaginal administration of naturopathic therapy.

- Advice to new mothers to put herbs and powders on the umbilical cord stump, a practice which is associated with increased rates of life-threatening oomphalitis.

- Opposition to vaccination, which puts individuals and the entire community at risk of measles, pertussis, influenza, and other preventable diseases. I have seen a school vaccine exemption form completed by a naturopath, although the Alaska state regulation clearly states that medical exemption forms should be completed by a licensed medical practitioner.

Board-certified medical physicians complete four years of medical school training, a minimum of three years of medical residency, and take a rigorous, nationally standardized secure examination to certify their ongoing maintenance of medical knowledge. Additionally, licensed physicians in Alaska are required to demonstrate completion of continuing medical education credits. Medicine is complex and the nature of scientific understanding of diseases continues to evolve as new studies are published. The field of scientific medicine requires specialized rigorous training to comprehend and to stay up to date with current standards of care. Naturopathic training focuses on health promotion, and can be complimentary to, but is not equivalent to primary care medical training, and is not designed to prepare students for the practice of scientific medicine.

The supplemental material attached to the HB 91 bill includes a statement that naturopaths graduate with 'more than 4000 hours' of training and clinical rotations. In contrast, according to the American Association of Medical Colleges (AAMC) US medical students on average complete an average of 157 weeks of training before they go on to complete an additional 3-7 years of residency clinical training. This equates to more than 6000 hours (at 40 hours per

week) during medical school, plus residency training, where work hours are capped at 80 hours per week. An estimate of residency duty hours, with 4 weeks of vacation/sick time, works out to up to an additional 11,500 hours of clinical training over three years. This works out to more than four times the numbers of hours of training reported by the naturopaths.

In the interest of protecting public health, I urge you as legislators to vote against HB 91.

If you have additional questions, please feel free to contact me.

Respectfully,

Kristin M Mitchell, MD FACP
Peninsula Internal Medicine
WWAMI 3rd year clerkship site director, Soldotna
Clinical Assistant Professor of Medicine, University of Washington

Ashley Strauch

From: John Finley, MD <[REDACTED]>
Sent: Monday, April 29, 2019 4:33 PM
To: Rep. Adam Wool
Subject: HB 91

Follow Up Flag: Follow up
Flag Status: Completed

Dear Representative Wool:

As a Medical Doctor practicing in Alaska for 44 years, I sincerely hope the item D, line 31 of page 3 of HB91 does not suggest naturopaths are to be allowed to prescribe prescription drugs. Their training is regarding herbal and plant medication, not in prescription medications or in surgery.

Furthermore, schools of naturopathy are far less scrutinized by regulation bodies and are less competitive regarding admission. Naturopaths do not have the years of postdoctoral training required of Medical Doctors and Doctors of Osteopathy to be allowed to practice. Medical Doctors and Doctors of Osteopathy further are subject of ongoing scrutiny by various regulating bodies and boards as well.

In my years of practice in Alaska, my observation is that non-physician practitioners may actually increase the cost of medical care by ordering unnecessary testing procedures due to insecurity regarding their clinical impressions. That expense I believe would extend to naturopaths ordering inappropriate tests and procedures as well.

Ultimately, if medicine prescription privileges and surgical privileges are given to all who apply, why should future physicians bother to spend the years and money to become bona fide physicians?

Yours truly,

John C Finley, MD, FACC, FASE

Ashley Strauch

From: Michelle Laufer <[REDACTED]>
Sent: Monday, April 29, 2019 4:54 PM
To: Rep. Adam Wool
Subject: naturopaths

Rep Wool

I am a pediatrician writing to encourage you to reject proposed changes to the scope of practice for naturopaths in Alaska.

Naturopaths are trained to prescribe natural and therapeutic substances and therapies. Perhaps they have their place in the healing community. However, those trained as naturopaths are not adequately trained to evaluate or manage serious or life-threatening disease. The problem is that when a patient presents to the doctor, they do not generally show up with a sign saying "I have a serious illness." It is up to the clinician, based on training and experience, to identify and investigate even common complaints for serious conditions when indicated. I often tell people that it is my job to worry about the worst case scenario and decide when we need to investigate further. Fortunately, most of the time I am able to reassure parents and patients, but sometimes experience and training tells me otherwise and this level of training and experience is not part of naturopathic training.

The most egregious case I have been involved with was of a patient brought to a naturopath for headaches. She was prescribed herbs, massage and an alternative touch therapy. A few months into the unresolving and worsening headache when she could not take the pain any longer she presented to the emergency room where she was diagnosed with an advance brain tumor and died days later. It was not even on this family's radar that this headache could indicate more serious disease. And it was not on that naturopath's radar either. This is out of their scope of practice. But the family thought they were seeing a "doctor" so did not seek further advice.

The public is confused by the word "doctor" already as it applies to naturopaths. I encounter this confusion by patients at least monthly. Allowing the use of the term "physician" will only further muddle the picture. People generally do not know or take the time to investigate their providers and are confused when I tell that that the person they saw was a naturopath.

Our patients deserve to trust the state's licensing procedure for medical providers. Allowing the changes delineated in HB 91 undermines this trust by further muddling the definition of those who are trained through medical school and residency, and those who are trained as alternative providers. This puts our patients at risk.

Thanks,
Michelle Laufer, MD

--
Michelle Laufer, MD

Ashley Strauch

From: Rep. Gabrielle LeDoux
Sent: Tuesday, April 30, 2019 8:31 AM
To: Deneen Tuck
Subject: FW: House Bill 91

Follow Up Flag: Follow up
Flag Status: Flagged

FYI in L&C

From: Phyllis Kiehl [REDACTED]
Sent: Monday, April 29, 2019 8:29 PM
To: Rep. Gabrielle LeDoux <Rep.Gabrielle.LeDoux@akleg.gov>
Subject: Re: House Bill 91

Dear Representative LeDoux,

As an Alaskan physician, pediatrician, with 43 years of experience treating patients in Anchorage, I urge you to vote No on House Bill 91, which would enable Naturopaths to prescribe and do minor surgeries. Naturopaths have 4 years of training after college, but this is in no way equivalent to the training of allopathic physicians or osteopaths. Their 2 years of "basic science" courses are not equivalent, and their 2 years after that are not either. Their training and supervised experience is nowhere near that of MD and DO physicians, and they should not call themselves physicians.

Naturopathy has a role complementary to traditional medical practice, but naturopaths do not have the training or experience to take the place of medical practice. Using dietary and natural treatments to support health is excellent. It should not supplant proven effective treatments.

Naturopaths unfortunately have promoted some treatments in lieu of proven ones, and some have discouraged patients from using appropriate therapies. Some have even discouraged immunization to prevent serious contagious diseases.

Please vote No on House Bill 91.

Respectfully,
Phyllis S. Kiehl, M.D., FAAP

Ashley Strauch

From: Rep. Gabrielle LeDoux
Sent: Tuesday, April 30, 2019 8:35 AM
To: Deneen Tuck
Subject: FW: Naturopath Credentials

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

From: [REDACTED]
Sent: Monday, April 29, 2019 9:46 PM
To: Rep. Gabrielle LeDoux <Rep.Gabrielle.LeDoux@akleg.gov>
Subject: Naturopath Credentials

Ms LeDoux:

I would like to voice my strong opposition to any expansion of naturopath credentials. I have been in practice in Anchorage since 1995, am triple board certified by American Board of Medical Specialists (Pediatrics, Otolaryngology, and Facial Plastics and Reconstructive Surgery.) I have seen many patients through the years that engaged with various naturopaths, and can state unequivocally from assessing the care provided that the practice of naturopathy is not based on science, is not rigorously studied, and has not provided any patients any benefits that I am aware of. When I first encountered naturopathic medicine I undertook, out of curiosity and to better understand the concepts of the practice, an in depth evaluation of their training and philosophies. What I found dismayed me immensely, and I could find little that would lead me to support that school of thought.

With the recent urge of naturopaths to expand into prescribing allopathic medicines and to do minor surgeries I again looked into their training, and still find nothing that supports that position. I've attached a revealing evaluation written by a former naturopath who became disillusioned by the lack of science and the incredibly thin record of training offered by Bastyr School of Naturopathy. This is a quick read about the true nature of naturopathic education. It sounds essentially self-taught, with little or no exposure to illnesses seen in clinical practice, no experience in prescribing allopathic medication, and little or no surgical training.

<https://sciencebasedmedicine.org/nd-confession-part-1-clinical-training-inside-and-out/>

This confirms in my mind that naturopaths should NOT be given any further credentials than they already have.

I am also frustrated at the continued efforts by non-physicians to try to label themselves as "doctor." Yes, a PhD is a doctor, but not a medical doctor. Using this term in relationship to clinical/medical care is misleading to the public and should not be allowed for any practitioners other than MD (medical doctors), DO (doctors of osteopathy), or DDS (doctor of dental surgery.) Any other utilization in the medical/clinical field amounts to suggesting to the public that whatever degree is being referenced is equivalent to those practitioners. It is misleading and inappropriate.

Thank you very much for your considerations.

Dwight M Ellerbe MD, FAAP, FACS
Alaska Center for Ear Nose and Throat, ACENT

My name is Mary Ann Foland. I am a family physician in Anchorage since 1977 and I oppose HB 91. Like most family physicians, I treat the whole patient with focus on prevention. It is important to know that this is not a turf issue, a workforce or access to care issue. There are only 60 naturopaths in this state. Many think you go to medical school and can either choose to be a neurosurgeon or a naturopath. That is simply not true. You do have access to information and policy statements from the American Academy of Family Physicians, the Alaska Academy of Family Physicians and the Alaska State Medical Association describing the difference. Kevin Jardel has given you the scope of practice wheel that compares the extra 12,000 to 15,000 hours of training for a physician, versus the hours needed to become a naturopath. You also have the 50 Page AMA evaluation that compares training for M.D., D.O., and naturopaths. The State Medical Board also opposes this bill and considers these changes as the practice of allopathic medicine. They feel this is not appropriate and not safe for the public. They have opposed this every time in the past and they will continue to oppose it.

I have some stories to share from the perspective of one physician in Anchorage:

I know of at least three Type I insulin dependent diabetic patients who were taken off their insulin by their naturopath. They were treated with diet and supplements. One of them was 14 weeks pregnant. Her A1c was over 11 and should be under 6, reflecting the fact that her blood sugar was in the 300 range. This is a huge risk for birth defects to the unborn child.

I know a physician who was distraught to tell a patient that the tissue she was losing vaginally tested positive for endometrial cancer. This is a late sign of progression for this disease. However, he was shocked that the patient was happy that the treatment her naturopath was giving her was working and allowing her body to expel the cancer cells.

There is a naturopath who injected phenol for back pain. None of the specialists I have talked to have any clue about why that would be recommended. She collapsed the patient's lung. He needed to be hospitalized for a chest tube to re-expand his lung. This is performed with the tube about the diameter of your thumb put in between the ribs and connected to suction to re-expand that lung. This naturopath did this twice. She is still practicing.

In my practice, a patient was referred to the allergy and immunology office in Anchorage. She was diagnosed with sensitivity to formaldehyde. This is not IgE mediated and therefore cannot be desensitized with allergy shots. The recommendation is to avoid formaldehyde and hope to eventually grow out of this sensitivity. The patient was then taken to a naturopath who reassured them that they would be glad to treat this by injecting small increasing amounts of formaldehyde. This patient is 9 years old.

A gynecologist I know had a middle-aged woman who is a smoker with hyperlipidemia and a history of coronary artery disease. She complained of low libido and was injected testosterone pellets. That resulted in a stroke. The American College of OB/GYN recommends that testosterone in high doses is never recommended for females.

A pediatrician who worked in Anchorage and also had a MPH moved out of state and decided to attend a naturopath school. He lasted less than two years. He felt he needed to quit because he was not allowed to ask any questions about the scientific basis for their recommendations. He felt it was faith-based and not a scientific evidence based program.

I am sure you will hear from many patients who love their naturopaths. That is fine, but not pertinent.

Naturopaths do not need to have prescriptive and surgical privileges. If their training is to be a naturopath, let them continue to be naturopaths and practice within the definition of Naturopathy. This relentless quest is the camel's nose under the tent for the issue of scope of practice. Please act to protect the health and safety of Alaska patients and do not pass this bill.

Thank you,
Mary Ann Foland
Mary Ann Foland, MD

Ashley Strauch

From: Hardy, Anp, Kathrine [REDACTED]
Sent: Wednesday, May 01, 2019 1:03 PM
To: Hardy, Anp, Kathrine
Subject: Naturopathic Bill

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

I am NOT in favor of lifting the current regulations regarding Naturopathic Practitioners. The degree they have pursued, and the practices they have built are based on different guidelines of treating patients. Their approach does not include prescription medications, minor surgeries, or other skills that are learned, and honed in other disciplines.

I am a Family Nurse Practitioner, in a large Family Medicine Practice, in Anchorage. I have been in practice for almost 20 years, both in Emergency Departments in TN, and AZ, as well as Internal Medicine, and Family Practices as well.

You will hear many stories, from MD's, DO's, NP's, PA's, naturopath's themselves, and many patients. There are very distinct differences in our practices, and the regulations that are being requested to be changed are not appropriate for their training.

Thank you for your time,

Kathrine Hardy, APRN
Family Nurse Practitioner

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Ashley Strauch

From: Leistikow, Corrine S. [REDACTED]
Sent: Thursday, May 02, 2019 8:17 AM
To: House Labor and Commerce
Subject: House Bill 91

Follow Up Flag: Follow up
Flag Status: Flagged

I urge you to vote against House Bill 91. My understanding is this bill would basically grant naturopaths the same rights to practice medicine as physicians. My opinion is that if they want to practice medicine, they should go to medical school and do a residency program and get properly trained to do so. This bill would basically allow naturopaths to practice as medical doctors without adequate training. This would equate to medical malpractice. This bill should not even be considered and if passed, would present a significant danger to our patients who see naturopaths. Naturopaths would be prescribing medication and performing surgery to their patients without adequate training. This is not the answer to get more access to primary care in the state of Alaska. Please contact me if you have further questions. Thank you.

Corrine Leistikow MD
Medical Director Family Medicine
Tanana Valley Clinic
~~907.257.1234~~

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Ashley Strauch

From: Buffington, Nathaniel J. [REDACTED]
Sent: Thursday, May 02, 2019 1:50 PM
To: Rep. Grier Hopkins; House Labor and Commerce
Cc: Leistikow, Corrine S.
Subject: Vote against House Bill 91

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Representatives,

I am writing this email in response to the proposed House Bill 91. I understand this Bill requests the expansion of the scope of practice for naturopaths in the state of Alaska to basically practice as primary care physicians. To say that I think this is a bad idea would be an understatement.

FedEx does not allow their truck drivers to become pilots and their pilots to become truck drivers just because they want to do something different. They require them to have the proper training and certification for the job and demonstrate their ability prior to being hired for that job. Why would we entrust the healthcare of patients to someone without proper training practicing medicine outside their scope of practice?

The American Association of Naturopathic Medical Colleges' website reports a similar foundation of knowledge that they report is comparable to allopathic medical schools for the first two years of their training. From that point, there is a 'divergence' from allopathic medical school curriculum to focus on 'holistic and nontoxic approaches to therapy with a strong emphasis on disease prevention and optimizing wellness'. 'The third and fourth years of training distinguish naturopathic medical programs from traditional medical schools in several ways. Much of the ND curriculum is devoted to non-pharmaceutical/non-surgical approaches to managing patient conditions and students spend significant time studying lifestyle counseling, nutrition, and health promotion.'

I do not pretend to have the training in botanical medicine and homeopathy that naturopathic medicine emphasizes in their training. I practice what I was trained to do. I worked hard in college studying biomedical sciences and took the MCAT and did well on that exam. I applied to and was accepted into allopathic medical school and took care of patients for long hours during a three year family medicine residency under the tutelage and direct supervision of board certified family physicians. I am required to maintain my board certification regularly by sitting for board examinations and regularly participating in continuing medical education activities. In the meantime, I continue to treat my patients as I was trained to do while realizing my limitations and when to refer to subspecialists.

It is apparent to me that this bill is a request by some misguided naturopaths who are looking for a short-cut or end-around medical school and residency training. The bill also runs counter to the vision of the American Association of Naturopathic Medical Colleges to focus on 'holistic and nontoxic approaches to therapy with a strong emphasis on disease prevention and optimizing wellness'.

We already have educational pathways in place to allow health care providers to practice primary care. My advice to those naturopaths that want to expand their services is to get the proper training to do so. They could apply to nursing school, work in intensive care for two years and then apply to nurse practitioner school. They could also apply to allopathic or osteopathic medical school and apply to residency subsequently. They could also apply to physician assistant school.

House Bill 91 is a poorly written bill with potential adverse consequences to Alaskans. I strongly encourage you to vote against this bill.

Thank you for your consideration,

-Nate Buffington, MD – Tanana Valley Clinic, Fairbanks, Alaska

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 12:18 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort

Office of Representative Ivy Spohnholz

State Capitol, Room 421

Juneau, AK 99801

(907) 465-2794



[Sign up for our e-news](#)

From: [REDACTED]
Sent: Wednesday, February 26, 2020 7:12 AM
To: House.Labor.&.Commerce@akleg.gov; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>
Subject: HB 91

Dear Ms. S. Hannan;

I would like to give my support to the Alaska Medical Association in the quest for a better regulations in the practice of medicine in Alaska. This will bring a safest health service for the citizens in the state,

I did practice in Sitka and I witness irregularities of non Physicians delivering care. Also it is important to mention the high number of non physicians , non fully prepared for the delicate task of handling lives with a limited understanding and knowledge of the Art and Science of Medicine.

Sincerely Neyton Baltodano MD, FACP

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 12:55 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort

Office of Representative Ivy Spohnholz

State Capitol, Room 421

Juneau, AK 99801

(907) 465-2794



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From: [REDACTED]
Sent: Tuesday, February 25, 2020 6:44 PM
To: House.Labor.&.Commerce@akleg.gov; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>
Subject: HB 91

Please do not allow naturopaths to prescribe or do minor surgery.

Donald J Schroeder, MD

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 1:09 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort

Office of Representative Ivy Spohnholz

State Capitol, Room 421

Juneau, AK 99801

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From: [REDACTED]
Sent: Tuesday, February 25, 2020 2:14 PM
To: House.Labor.&.Commerce@akleg.gov; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>
Subject: HB 91

As a physician in Alaska I am alarmed that Naturopaths are seeking to expand their scope of practice. As someone who has practiced in many other states, I am constantly horrified at the profligate waste of money coming from lab tests ordered seemingly indiscriminately by Naturopaths. If only to save money, Naturopaths should be immediately suspended from any type of practice of medicine.

It is the shame of Alaska that these charlatans exist at all, let alone can order labs. Your constituents would definitely be put at risk for significant illnesses if these untrained expand their scope of practice in any way.

Bradford W. Fenton, MD, PhD, FACOG

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 1:09 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort

Office of Representative Ivy Spohnholz

State Capitol, Room 421

Juneau, AK 99801

(907) 465-2794



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From: Jenny Lessner [REDACTED]
Sent: Tuesday, February 25, 2020 2:20 PM
To: House.Labor.&.Commerce@akleg.gov; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>
Subject: HB 91

Dear Representatives,

I am reaching out as a Family Medicine Physician practicing in Fairbanks and asking you to vote no on HB 91. This legislation proposes to expand the scope of practice for naturopaths to allow these providers prescribing privileges, the ability to perform minor surgeries, and the use of the title "physician".

I believe this legislation would be harmful and dangerous for our state. I've been a physician in Alaska for over a decade, and for the past 8 years I've built strong ties with the local medical community here in Fairbanks. As a Family Doctor I've worked together with several naturopaths here in town regarding care for many of my patients over the years; I've seen cases where the naturopathic approach can provide tremendous benefit to my patients and complement the traditional allopathic treatment modalities I'm proficient in. However, it has been through these experiences that I've seen firsthand how very different naturopathic practice is from that of an actual medical physician. As a physician it is quite frankly terrifying to me to think of these providers attempting to prescribe medications or perform surgeries. Naturopaths are NOT educated or trained to safely or effectively prescribe medications or safely conduct surgeries. Naturopathic theory and practice are not based on the body of knowledge related to health, disease, and health care that has been widely accepted by the scientific community.

I truly believe that all patients deserve health care delivered by a fully-trained and licensed physician, who receives thorough, comprehensive training in 4 years of medical school and, at minimum, three years of additional residency graduate medical education.

I urge you to vote no on HB 91.

Respectfully,

Jenny Rose Lessner, MD



1901 Swallow Drive
Fairbanks, AK 99709

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 12:58 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort
Office of Representative Ivy Spohnholz
State Capitol, Room 421
Juneau, AK 99801
(907) 465-2794

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-----Original Message-----

From: Bret Mason [REDACTED]
Sent: Tuesday, February 25, 2020 5:12 PM
To: House.Labor.&.Commerce@akleg.gov; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>
Subject: HB 91

To whom it may concern,
I am opposed to HB91.

It sets a dangerous safety hazard to the unsuspecting public. These people have no training in prescribing prescription medications or safe sterile surgical technique.

Why is it that years of medical school and surgical residencies mean nothing if all you have to do is acquire a meaningless degree, call yourself doctor and legislate your privileges from an expensive lobbyist?

Would you take your child to a naturopath for a surgical procedure?

You can't legislate years of training to people that couldn't qualify for medical school!

If you open this back door to the herbalists and vitamin practitioners, more scantily qualified folks in the wings will be eager to enter. Next, will be the chiropractors and fortune tellers. Everyone wants to be addressed as doctor, but few want to invest the time and effort.

Vote NO on HB 91.

Thanks,
Bret L. Mason, D.O.
Orthopedic Surgeon

205 E. Dimond #753
Anchorage, Ak. 99515

Sent from my iPhone

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 12:56 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort
Office of Representative Ivy Spohnholz
State Capitol, Room 421
Juneau, AK 99801
(907) 465-2794



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From: Daniel McCulley [REDACTED]
Sent: Tuesday, February 25, 2020 6:01 PM
To: House.Labor.&.Commerce@akleg.gov; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>
Subject: HB 91

Good evening,

I'm an internal medicine and geriatric physician in Fairbanks, and would like to express some concerns I have with the proposal to expand the scope of practice for naturopaths in Alaska. Based on my experience I feel this is unwise, and could be harmful to my patients. What follows are my personal views, and I am not representing my employer in this email.

I went to medical school at the University of Washington, and the top naturopathic schools is nearby. Over and over I saw unwise prescribing practices from the naturopaths there, because of the expanded scope of practice in Washington. I saw people inappropriately prescribed hormones for weight loss, antibiotics misused, medications prescribed without appropriate discussions regarding potential side effects, and diagnoses made without an appropriate work-up. I did not meet one doctor in the University of Washington system that thought naturopaths should have as big a scope of practice as they do in that state.

Naturopathic training is not based on the best medical evidence, incorporates a lot of pseudoscience, and they are not trained to understand the nuances of when medication side effects outweigh benefits.

Due to the vast training differences, it is misleading to patients to let naturopaths call themselves physicians. I completed 4 years of additional residency and fellowship training, working under the supervision of licensed doctors, after medical school before starting independent practice, and feel that this training was invaluable to be able to provide quality patient care. Naturopaths do not have to do a residency after school is done to become licensed, so even if their training was equivalent to medical school (which it is not), I still do not think they would be qualified to prescribe

medications and have an expanded scope of practice since they have at a minimum 3 years less training than any primary care doctor.

These 2 articles are from a former naturopath, who realized how poor and unscientific her training was and left the profession:

- <https://sciencebasedmedicine.org/nd-confession-part-1-clinical-training-inside-and-out/>

- <https://sciencebasedmedicine.org/nd-confession-part-ii-the-accreditation-of-naturopathic-medical-education/>

Thank you for considering my opinion,

Daniel McCulley, MD
Internal Medicine, Geriatrics
Tanana Valley Clinic
Denali Center Medical Director

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 1:17 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort
Office of Representative Ivy Spohnholz
State Capitol, Room 421
Juneau, AK 99801
(907) 465-2794

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-----Original Message-----

From: Tak-ming Ko [REDACTED]
Sent: Tuesday, February 25, 2020 12:42 PM
To: House.Labor.&.Commerce@akleg.gov; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>
Subject: HB 91

I don't believe that Naturopathic providers should start writing prescription or perform surgery. That is not even in their scope of training and multiple other well trained professionals are currently fulfilling this need and if that's their intend, they should start with new training programs.

Sincerely,
Tak-ming Ko MD

Sent from my iPhone

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 1:06 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort

Office of Representative Ivy Spohnholz

State Capitol, Room 421

Juneau, AK 99801

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From: Werle, Zachary [REDACTED]
Sent: Tuesday, February 25, 2020 3:39 PM
To: House.Labor.&.Commerce@akleg.gov; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>
Subject: HB 91

To Whom It May Concern,

I have practiced as a Family Medicine/Urgent Care physician in Fairbanks since 2008, after completing four years of medical school and an additional three years of Family Medicine residency. Naturopaths do not have the same level of training and experience as physicians in pharmacology and procedural training. To expand their privileges to include prescribing medications and performing minor surgeries will place Alaskans who seek their care at risk for harm. I strongly encourage you to oppose this bill.

Respectfully,

Zach Werle DO

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Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 1:36 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort

Office of Representative Ivy Spohnholz

State Capitol, Room 421

Juneau, AK 99801

(907) 465-2794



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From: Jean Tsigonis [REDACTED]
Sent: Tuesday, February 25, 2020 11:01 AM
To: Sen. Click Bishop <Sen.Click.Bishop@akleg.gov>; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>
Subject: HB 91

Dear Senator Bishop and Representative Spohnholz:

I have concerns over Naturopaths getting licensed to write for prescriptions and doing surgical procedures. Please be sure they are working within their license and not the license of an MD or DO.

Sincerely,

Jean Tsigonis MD, MPH

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 1:38 PM
To: Ted Madsen
Subject: FW: Vote NO - HB 91

Kasey Casort
Office of Representative Ivy Spohnholz
State Capitol, Room 421
Juneau, AK 99801
(907) 465-2794



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From: Buffington, Nathaniel J. [REDACTED]
Sent: Tuesday, February 25, 2020 8:59 AM
To: Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Louise.Stutes@akleg.gov; Zack.Fields@akleg.gov; Sara.Hannan@akleg.gov; Andi.Story@akleg.gov; Rep. Mel Gillis <Rep.Mel.Gillis@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>; Sen. Click Bishop <Sen.Click.Bishop@akleg.gov>
Cc: Rep. Grier Hopkins <Rep.Grier.Hopkins@akleg.gov>
Subject: Vote NO - HB 91

Dear Representatives,

I am writing this email in response to the proposed House Bill 91. I understand this Bill requests the expansion of the scope of practice for naturopaths in the state of Alaska to basically practice as primary care physicians. To say that I think this is a bad idea would be an understatement.

FedEx does not allow their truck drivers to become pilots and their pilots to become truck drivers just because they want to do something different. They require them to have the proper training and certification for the job and demonstrate their ability prior to being hired for that job. Why would we entrust the healthcare of patients to someone without proper training. Who of you wants to see healthcare providers practicing medicine outside their scope of their practice?

The American Association of Naturopathic Medical Colleges' website reports a similar foundation of knowledge that they report is comparable to allopathic medical schools for the first two years of their training. From that point, there is a 'divergence' from allopathic medical school curriculum to focus on 'holistic and nontoxic approaches to therapy with a strong emphasis on disease prevention and optimizing wellness'. 'The third and fourth years of training distinguish naturopathic medical programs from traditional medical schools in several ways. Much of the ND curriculum is devoted to non-pharmaceutical/non-surgical approaches to managing patient conditions and students spend significant time studying lifestyle counseling, nutrition, and health promotion.'

I do not pretend to have the training in botanical medicine and homeopathy that naturopathic medicine emphasizes in their training. I practice what I was trained to do. I worked hard in college studying biomedical sciences and took the MCAT and did well on that exam. I applied to and was accepted into allopathic medical school and took care of patients

for long hours during my second two years of medical school and a three year family medicine residency under the tutelage and direct supervision of board certified family physicians. I am required to maintain my board certification regularly by sitting for board examinations and regularly participating in continuing medical education activities. In the meantime, I continue to treat my patients as I was trained to do while realizing my limitations and when to refer to subspecialists.

It is apparent to me that this bill is a request by some misguided naturopaths who are looking for a short-cut or end-around medical school and residency training. The bill also runs counter to the vision of the American Association of Naturopathic Medical Colleges to focus on 'holistic and nontoxic approaches to therapy with a strong emphasis on disease prevention and optimizing wellness'.

We already have educational pathways in place to allow health care providers to practice primary care. My advice to those naturopaths that want to expand their services is to get the proper training to do so. They could apply to nursing school, work in intensive care for two years and then apply to nurse practitioner school. They could also apply to allopathic or osteopathic medical school and apply to residency subsequently. They could also apply to physician assistant school. A short cut legislative piece to allow naturopaths to perform medical care they were not trained to do is unwise to say the least. I would like a detailed explanation from our representatives who are sponsoring this bill on why this bill is even being considered.

House Bill 91 is a poorly written bill with potential adverse consequences to Alaskans. I strongly encourage you to vote against this bill.

Thank you for your consideration,

-Nate Buffington, MD – Family Medicine, Tanana Valley Clinic, Fairbanks, Alaska

Ted Madsen

From: Kasey Casort
Sent: Wednesday, February 26, 2020 1:39 PM
To: Ted Madsen
Subject: FW: HB 91

Kasey Casort

Office of Representative Ivy Spohnholz

State Capitol, Room 421

Juneau, AK 99801

(907) 465-2794



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From: mary stewart [REDACTED]
Sent: Tuesday, February 25, 2020 8:36 AM
To: Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>; Representative.MelFillis@akleg.gov
Cc: Tammy Thiel [REDACTED]
Subject: HB 91

Dear Representatives,

I am a blood and cancer physician who has been practicing in Anchorage for more than 30 years. It recently came to my attention that there is a bill before the legislature which would allow naturopaths to prescribe medications and perform minor surgeries. This is, in my opinion, dangerous. Someone will die or be greatly harmed. The number of medication interactions is enormous, and it is only with the greatest diligence, that we avoid problems. Just last week, a patient came in for a regular checkup and told me that a family physician had placed her on an antidepressant medication. It just so happens that certain antidepressants have an unfavorable interaction with the medication she is on for her breast cancer. It blocks the entire anticancer effect. This is just one example, and there are many more. Please, do not pass this bill.

Mary Stewart MD

Ted Madsen

From: Jeff Sponsler [REDACTED]
Sent: Wednesday, February 26, 2020 1:15 PM
To: House Labor and Commerce
Subject: HB 91

As an physician specialist, I employ science based FDA approved treatments for medical disorders. After my undergraduate studies in biology, a master's in computers, and an MD from West Virginia University I have a total of 17 years of higher education. There is no substitute for this training when treating human illness.

Naturopathic medicine is **pseudoscientific**. In other words, junk science, feel-good "medicine."
For the gullible to take their hard earned dollars for in a word nothing.

Keep its scope small.

By selecting unscientific naturopathic treatments, patients may not obtain quality evidence based medical therapies. Back in WV I had a colleague (a doctor in fact) who instead of normal treatments for breast cancer took a Naturopathic approach. She is dead.

Thank you

Dr. Jeffrey L. Sponsler
Board Certified Neurologist
Wasilla, Alaska

[REDACTED]

Ted Madsen

From: Chad Barnes, MD [REDACTED]
Sent: Thursday, February 27, 2020 1:08 PM
To: House Labor and Commerce
Subject: HB 91

Dear Sirs and Madams,

I am a nephrologist in town. I saw a patient in clinic recently who had been significantly ill for several months last fall without clear reason. During that time and up until now her kidney function had declined, again without an obvious explanation. Documentation from a naturopathic visit indicates she was taking these supplements:

saccharomyces boulardii
mesoglycan
mito-detox
polyresveratrol
astaxanthin
lith-oro
genistein
protosorb
cortisol
taurine
full spectrum vitamin K
resinall K tincture
7-keto
pregnenolone
DHEA
cerefolinac
wobenzym N

I am not the only provider with concerns that ingredients in one or more of these contributed to her illness and renal functional decline. One of these was intended to treat an inherited condition she has that has no known pharmacologic treatments. How can it be that any person would benefit from taking this number of supplements, with unknown ingredients? How could we possibly know how these interact with prescription medications. There is no science to support this dangerous practice, and not enough regulation in place to prevent it.

Thank you for your time,
Chadwick Barnes, MD

Ted Madsen

From: Roger Biehl [REDACTED]
Sent: Wednesday, February 26, 2020 1:21 PM
To: House Labor and Commerce
Subject: HB 91

Hi

to whom this may concern

I am writing to oppose HB 91

giving naturopaths, minor surgical procedures and prescription capabilities, is letting practitioners have the ability to practice beyond their means. This is what has happened with nurse practitioners, where NP's are practicing like they are residency trained providers, doing liposuction in their office = crazy.

If these people wanted these privileges they should have went to MD/DO schools where after schooling they spend another 4-8 years learning beyond their initial training, learning under others before we are on our own doing procedures and surgeries!!!!!!!

sincerely

Roger C. Biehl, M.D., FACOG

Alaska Women's Advanced Pelvic Surgery & Urogynecology

P: 907-743-8064 F: 907-743-8065

Ted Madsen

From: Marin Granholm [REDACTED]
Sent: Thursday, February 27, 2020 8:40 PM
To: House Labor and Commerce
Subject: HB 91

Dear Representatives:

I am writing to express my sincere concern regarding HB 91 proposing changes to AK State medical regulations. Specifically, I am concerned that the bill proposes to expand the scope of naturopathic practice far beyond what any average person would consider safe or reasonable. The bill allows naturopaths to perform “minor surgeries.” Please note that “minor surgeries” may generally be considered to include such procedures as cataract surgery, circumcision, breast biopsy, arthroscopy, and laparoscopy. The bill allows naturopaths to prescribe potentially dangerous pharmaceuticals, which may include cardiac antiarrhythmics, antipsychotics, blood thinners or immunosuppressants. The bill allows naturopaths to prescribe contraceptive devices, which may include devices which are implanted under the skin or inside the uterus and carry risks of infection or uterine perforation. The bill allows naturopaths to order diagnostic procedures. Examples of diagnostic procedures: amniocentesis, bone marrow aspiration, cerebral angiography, spinal tap. With all due respect to my naturopathic colleagues, according to the Oxford dictionary, naturopathy is “a system of alternative medicine based on the theory that diseases can be successfully treated or prevented without the use of drugs, by techniques such as control of diet, exercise and massage.” The above proposed changes appear to lie far outside of this scope, and I am concerned that making these changes would endanger patients. Thank you very much for your time.

Sincerely,

Marin Granholm, MD
Anchorage

Ted Madsen

From: Kristin Mitchell [REDACTED]
Sent: Wednesday, February 26, 2020 6:50 PM
To: House Labor and Commerce
Subject: Opposition to HB 91

Distinguished members of the AK State Legislature

Thank you for taking testimony regarding licensure and scope of practice for naturopaths in Alaska. I had the opportunity to testify by phone last May, and am reiterating some of the same concerns now by email, as I am committed to seeing my internal medicine patient panel in Soldotna during the scheduled hearing.

The emphasis in naturopathic training is on health promotion and use of diet and natural substances to promote health and wellness. These are important goals. They are not, however, equivalent to the physician training that emphasizes the detection of serious illness and underlying biochemistry, physiology and pharmacology of interventions to cure or manage such disease. Naturopaths do not have equivalent education when compared with MD and DO physicians. They should not be licensed to practice as primary care physicians.

I took this opportunity to review the statement from the AANMC (Association of Accredited Naturopathic Medical Colleges) on the Core Competencies of the Graduating Naturopathic Student, dated October 25, 2019. In no place in the document does it refer to prescribing pharmacologic medication or performing surgery. If the Association accrediting graduating students does not include prescribing pharmaceuticals or performing surgery in their core competencies, I do not think the State of Alaska should extend naturopathic licenses to include activities for which the naturopath is not trained or qualified, and which hold the potential to seriously harm patients.

Patients already have difficulty distinguishing between physicians and advance practice providers including PAs and NPs. Referring to naturopaths as physicians or doctors will exacerbate this confusion. Practitioners trained in diet, health promotion, and illness prevention should limit their scope to their area of training, and state licensing should reflect those limits.

Thank you for taking my testimony, and thank you for taking seriously your duty to protect the health and welfare of vulnerable Alaskans.

[AANMC Core Competencies of the Graduating Naturopathic Student](#)

Kristin M Mitchell, MD FACP
Clinical Associate Professor, WWAMI School of Medicine

Ted Madsen

From: Kathy Young {Case} [REDACTED]
Sent: Thursday, February 27, 2020 10:40 PM
To: House Labor and Commerce
Subject: HB 91

Dear Sir or Madam

It is deeply concerning to me that providers who wish to known for providing "natural medications" now surprisingly feel the need to prescribe pharmaceuticals and wish to perform surgery.

In order for any medical physician or surgeon to be licensed in the State of Alaska not only do they have to have graduated from a recognized medical school but they also are required to have completed at a minimum a 3 year post graduate residency training. This is reflects the complexity of modern medicine and surgery.

I worry for the safety of our patients if Naturopath graduates fresh out of school are permitted to prescribe not the naturopathic medications they went to school to master but the full range of pharmaceuticals and preform minor surgery. You do not allow new medical physician graduates do this outside of a carefully supervised residency and their training is significantly more focused on pharmaceutical medications and surgery.

Please do not accept this legislation.

Sincerely
Dr Kathy Young

February 23, 2020

Alaska Legislature
House Labor and Commerce Committee

Re: HB 91; regulating Naturopathic Practitioners

Dear Representative:

I am writing out of concern about the changes proposed in HB 91 to enable naturopaths to prescribe medications and perform surgery. This is an issue that has been before the legislature many times, and has appropriately been rejected. I encourage you to reject it yet again.

I am a Family Physician and a life-long Alaskan. I trained in the WWAMI program and spent my career caring for underserved Alaskans and training Family Physicians. I am a professor in the WWAMI program and was the founding director of the Alaska Family Medicine Residency, which has trained 1/3 of Alaska's Family Physicians. As a career-long medical educator, I am quite familiar with the educational needs of practitioners.

I can tell you that naturopaths do not have the education to safely and competently prescribe pharmaceuticals or perform surgery. In their information on “educational comparisons” submitted in support of HB 91 (available on BASIS) they state that physicians have about 3000 hours of training in these areas in medical school, and compare that with 2000 hours of naturopathic training. This is disingenuous, because physicians ALSO have to complete at least 2 years of residency (3 years to be Board Certified) before they can be licensed. Residency comprises at least 2500 hours per year of practice under training supervision in prescribing medications and performing surgery. So each physician has over 10,000 hours of clinical training in these areas before being allowed to practice them independently. Naturopaths have less than a quarter of this education.

I know from having supervised hundreds of medical students and residents that prescribing medications and performing surgery are not simple matters and should not be part of a scope of practice for someone who has not had extensive training. I have for many years practiced with Physician Assistants and Nurse Practitioners, and I find them to be important members of the care team. With good support from physicians they provide excellent care. I do not, however, support their practices if not closely collaborating with physicians.

Why do naturopaths want to do these medical functions? They don't believe in drugs or surgery; they are Natural Healers. Their tradition and training are all about using natural means, including herbs, diets, exercise, and mindfulness to improve health. This is a role they are very good at, and they fill an important need. Expanding their scope into the medical world seems nothing more than an attempt to increase market share.

Residency directors are the last gatekeepers of physician licensability. The key characteristic that every director looks for in each trainee is, “do they know what they don't know?”. The only safe practitioners are those who know not only their area, but also their limitations. The fact that Naturopaths think they can do this physician work demonstrates that they do not understand their limitations.

Physicians have to clean up the mess when poorly trained practitioners make mistakes, so I have seen

the results. The extra clinical training physicians have is not so much to let us know when it is appropriate, for example, to prescribe an antibiotic for a urinary tract infection, but to be alert to the possibility that it is NOT just a urinary tract infection. When you have seen and managed complex disease, you have a much better appreciation for how things can go wrong. In medicine what you don't know will hurt not just you, but more importantly, your patient.

Expanding the scope of naturopathic practice is not necessary and it is not safe.

Thank you for considering my comments.

Harold Johnston MD FAAFP
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