



April 1, 2021

The Honorable David Wilson, Chair
Senate Health and Social Services
Alaska State Legislature
State Capitol Room 121
Juneau, AK 99801

RE: Support for Alaska Senate Bill 38

Dear Sen. Wilson and Members of the Committee,

The American Association of Naturopathic Physicians (AANP) commends the Committee for holding a hearing on SB38, the bill to expand scope of practice for Naturopathic Physicians in Alaska. Naturopathic Physicians are educated and trained to practice as fully independent primary care providers, yet in Alaska their scope of practice is severely and arbitrarily limited, which in turn limits access of Alaskans to an important solution to expand access to healthcare. The AANP wholeheartedly supports SB38, which enables licensed Naturopathic Physicians to practice to the fullest extent of their education and training.

Allow me to respond to James L. Madara, MD of the American Medical Association letter dated February 2, 2021. Dr. Madara's claim that the use of "physician" by licensed Naturopathic Physicians in Alaska will create confusion and mislead Alaskans is false. The title "physician" is not exclusive to MDs/DOs. It is a title that demonstrates a level of competency and proficiency in the healing arts. Use of the term "physician" by licensed Naturopathic Doctors (ND) is well codified at state, national, and international levels.

The 2011 UNESCO International Standard Classification of Education (ISCED) levels are designed to aid understanding of different educational programs, and the World Naturopathic Federation maps the [naturopathic medical education of licensed NDs](#) to be equivalent to ISCED Level 6, with the recommended title usage of "naturopathic doctor" or "naturopathic physician." In the US, the Department of Labor defines the occupation of "naturopathic physician" in its 2020 [O*Net database as classification 29-1299.01](#). The O*NET Program is the nation's primary source of occupational information. And, despite AMA's attempts to claim exclusive use of the title, 10 states that license Naturopathic Doctors also specifically grant statutory authority to use the title "naturopathic physician," as do many states also allow the title "physician" to be applied to doctors of chiropractic and others.

Dr. Madara's claim that licensed Naturopathic Physicians scope of practice should not be expanded to include prescriptive privileges unless they receive the same training as MDs and DOs also demonstrates a

fundamental lack of understanding of naturopathic medical education. MDs and DOs are not the only profession that includes comprehensive training in pharmacy and pharmaceutical prescribing. Fourteen states grant NDs prescribing privileges (see attached). And according to the US Drug Enforcement Administration, 9 of those states also grant [prescriptive privileges for controlled substances](#), with several of those states having full primary care prescribing privileges commensurate with the scope of practice of MDs and DOs. While we recognize that SB38 stops short of requesting authority to prescribe controlled substances, prescribing authority generally is well within the training and education of naturopathic physicians, as evidenced in the Association of Accredited Naturopathic Medical Colleges 2020 [comparison of medical programs between MD/DO, ND, and NP](#).

Dr. Madera also misconstrues the distinction between major surgery and minor office procedures. Major surgery is an invasive operative procedure in which a body cavity is entered, organs are removed, or normal anatomy is altered. Naturopathic physicians are educated and trained in minor office procedures, commonly defined to include the removal of foreign bodies located in superficial tissues and the use of antiseptics and local topical anesthetics. This is necessary for simple procedures like performing punch biopsies to screen for skin cancer. Additionally, Naturopathic Medical students must complete a minimum of 1200 hours of clinical training before residency¹. Of the 28 states that license naturopathic physicians, 53% (15) expressly allow minor office procedures.

The AANP strongly encourages the adoption of SB38. The modernization of Alaska's Naturopathic Physician scope of practice is consistent with long-standing statutory authority in a majority of states that license NDs, where for many years Naturopathic Physicians have practiced to the full extent of their education, training and professionalism. Adoption of SB38 will benefit all Alaskans by expanding their access to and choice of healthcare providers.

Thank you for your consideration. If I can answer any questions or if you would like further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, reading "Laura Culberson Farr". The signature is fluid and cursive, with the first name "Laura" being the most prominent.

Laura Culberson Farr
Executive Director

¹ ND, MD/DO, NP: What's the difference? The Association of Accredited Naturopathic Medical Colleges, <https://aanmc.org/comparing-nd-md-curricula/>