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**From:** jennifer sampson [REDACTED] >  
**Sent:** Monday, February 19, 2024 8:13 AM  
**To:** House Finance  
**Subject:** HB 115

Dear Committee Members,

Please support HB 115, the Naturopathy bill. At the present time, someone who seeks naturopathy solutions must pay for two doctors- a naturopath and a traditional doctor. Under this proposed framework, naturopathy physicians who have the appropriate training can prescribe medicines like cholesterol medication and metformin do not have to pay two physicians. This will greatly reduce the cost of care for patients who seek naturopathy solutions and allow physicians to focus their expertise on those who seek traditional medicines. It saves patients money, and reduces the cost of providing services to those who chose to use naturopathy solutions but require some support from traditional medicine to enable naturopathy solutions to work.

Kind Regards,

Jennifer Sampson  
Fairbanks, AK  
US

# Alaska State Medical Association

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February 29, 2024

Transmitted by email: [House.Finance@akleg.gov](mailto:House.Finance@akleg.gov)

Representative Bryce Edgmon, Co-Chair  
Representative Neal Foster, Co-Chair  
Representative DeLena Johnson, Co-Chair  
Members of the House Finance Committee

Re: HB 115

The Alaska State Medical Association represents physicians and physician assistants across the state and is interested in the health and well-being of all Alaskans.

The State Medical Association opposes HB 115 on multiple grounds. We recognize that there is a shortage of primary care providers in Alaska. We also recognize that naturopaths are equating themselves to nurse practitioners, who have authority to practice independent of physician supervision or collaboration. However, when a patient sees a nurse practitioner, the patient knows their provider is a nurse. When a patient sees a naturopath, often referred to as a naturopathic doctor or even a naturopathic physician, the patient is often unaware that their provider is not a physician with seven to twelve years of medical education, training and experience.

Naturopathy is often defined as: a system of treatment of disease that avoids drugs and surgery and emphasizes the use of natural agents (such as air, water, and herbs) and physical means (such as tissue manipulation and electrotherapy) or 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.

As such, naturopathic education has a different focus, and their pharmacology education is not nearly as robust as that of physicians. Additionally, physicians have at least three years of supervised residency training to practice what was learned in medical school. Naturopaths have no similar requirements.

We are also concerned about the office procedures “using operative, electrical, or other methods, ... for the repair and care of superficial lacerations, abrasions, and lesions and the removal of foreign bodies located in the superficial tissues of the human body”. As detailed in the letter from the American Society for Dermatologic Surgery “Excising potentially cancerous lesions, prior to a

full medical exam, could render a skin cancer undetectable, lead to the spread of cancer, or alter its pathology resulting in prolonged diagnosis or in some cases, death. Further, health care costs could increase if naturopaths unnecessarily order laboratory examinations.” Though treatment of lacerations, abrasions and lesions sounds relatively minor, there is too much room for harm to the patient.

We therefore respectfully request that you oppose HB 115 as it has too much potential to harm Alaskans. Naturopaths should focus on their complementary approach to health and wellness. There are already areas of health care in Alaska that include a naturopath as part of a team that includes science-based physicians to allow for the complementary approach for patients who prefer that inclusion. The legislature should support a collaborative approach and utilize different practitioners in the manner they each were educated and trained.

Respectfully submitted,

A handwritten signature in cursive script that reads "Pam Ventgen". The signature is written in dark ink and is positioned above the printed name.

Pam Ventgen, Executive Director

March 1, 2024

The Honorable Bryce Edgmon, *Co-Chair*  
The Honorable Neal Foster, *Co-Chair*  
The Honorable DeLena Johnson, *Co-Chair*  
House Finance Committee  
120 4<sup>th</sup> St., Room 519  
Juneau, AK 99801

RE: **Oppose House Bill 115**

Dear Co-Chairs Edgmon, Foster, and Johnson:

On behalf of the Northwest Society of Plastic Surgeons (NWSPS) and the American Society of Plastic Surgeons (ASPS), we are writing **in opposition to** House Bill 115 (H.B. 115). ASPS is the largest association of plastic surgeons in the world, and in conjunction with NWSPS, represents more than 8,000 members and 92 percent of all board-certified plastic surgeons in the United States – including 20 board-certified plastic surgeons in Alaska. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety.

H.B. 115 would allow naturopaths – who are not physicians – to perform and oversee procedures that fall squarely within the practice of medicine. This is ill-advised. As surgeons, we encourage you to uphold the high level of patient care that has been established and allow the practice of medicine only by health care providers who meet appropriate education, training, and professional standards.

Under the current version of H.B. 115, a naturopath – who is not an allopathic (MD) or osteopathic (DO) physician surgeon – can “perform procedures in the office using operative, electrical, or other methods, including the use of antiseptics and local anesthetics, for the repair and care of superficial lacerations, abrasions, and lesions and the removal of foreign bodies located in the superficial tissues of the human body”. These procedures and modalities all fall squarely under the practice of medicine, and several are considered surgery that must be performed or delegated by a licensed physician surgeon. Yet, H.B. 115 expressly authorizes naturopaths who, again, are *not* medical doctors, full freedom to do them all.

Our concerns with that existing expansion are compounded by H.B. 115’s mechanisms for further expanding the scope of naturopaths. Specifically, the bill creates a new Naturopathy Advisory Board that is granted far too much authority. While the bill’s inclusion of one MD/DO board member is appreciated, we strongly believe that non-medical professionals should not be determining what level of medical training is appropriate. State medical boards, including Alaska’s, are comprised of physicians and given the authority to self-regulate their profession. That is because they are the highest authorities on the practice of medicine. Naturopaths are *not* the highest authorities on the practice of medicine, and as such, should not be authorized to make these kinds of decisions. The rationale is derived from the clear difference in training that physicians and naturopaths complete.

Plastic surgeons must attain a core medical and surgical education while completing ten to twelve years of training, which includes increased responsibility and decision-making authority in the hospital setting. Board-certified plastic surgeons must: (1) earn a medical degree; (2) complete six to eight years of full-time experience in a residency training program accredited by the Accreditation Council for Graduate Medical Education (ACGME); and (3) the last three years of training must be completed in the same program. Ultimately, surgeons will train as much as four-times-as-long as naturopaths. The education and training of a naturopath is in no way comparable to that of a medical doctor, and it is dishonest to refer to naturopaths as “naturopathic doctors” or “naturopathic physicians”.

If you are still unconvinced that expanding the scope of practice for naturopaths would be a mistake, please look at the link in the footnote. This is a news story from Arizona outlining ongoing concerns with naturopaths in their state performing cosmetic procedures, such as breast augmentations and gluteal fat-grafting (commonly known as “Brazilian Butt-Lifts” or “BBLs”), that has resulted in shocking outcomes.<sup>1</sup> To further complicate matters, the state’s board of naturopathy has refused to discipline their licensees or condemn these practices – creating a major patient safety dilemma in the state.

Thank you for consideration of our comments. Please do not hesitate to contact Joe Mullin, ASPS State Affairs Manager, at [jmullin@plasticsurgery.org](mailto:jmullin@plasticsurgery.org) or (847) 981-5412 with any questions or concerns.

Sincerely,



Steven H. Williams, MD  
President, American Society of Plastic Surgeons



Shahram Salemy, MD, FACS  
President, Northwest Society of Plastic Surgeons

cc: Members, House Finance Committee

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<sup>1</sup> <https://www.12news.com/article/news/investigations/i-team/some-arizona-naturopaths-are-using-a-loop-hole-to-perform-surgeries/75-27f5fdd2-f315-4c9c-afb2-7170939043c9>