

Konrad Jackson

From: Shawn Vainio <shawnvainio@gmail.com>
Sent: Sunday, February 26, 2023 12:45 PM
To: Sen. Jesse Bjorkman
Subject: Naturopath Bill SB44

Follow Up Flag: Follow up
Flag Status: Completed

Senator Bjorkman

I have heard back from multiple legislators regarding the proposed SB 44 Naturopathic Bill and would like to share the following requested facts:

- 1) I worked on a Naturopath Working Group from May 2021 to November 2021, and dedicated dozens of hours to meeting with Joe Hayes (from Senator Kawasaki's office), Naturopaths Scott Luper and Abby Laing, the Alaska State Medical Association and the Alaska Academy of Family Physicians (of which I am a Board member, currently serving as Past President).
- 2) I work with traditional Tibetan healers in the Himalayas and have done so for 20+ years.
- 3) I work with non-physician prescribers every workday in Bethel, AK.
- 4) I lobbied Senator Stevens and then Representative Austerman back in the late 2000s early 2010s to require direct entry midwives to be certified by the state and therefore overseen by the state with statute and regulations governing their scope of practice, rather than the prior legislation allowing direct entry midwives to practice without certification or supervision. I did this not to restrict the practice of midwifery, but to protect the public.
- 5) It is the duty of government to protect the people.
- 6) There are a limited number of naturopaths in Alaska seeking to expand scope of practice to prescribe Western medications, perform procedures and order labs and imaging, 3 out of 50 per our 2021 Naturopath Working Group.
- 7) The population of Alaska sits at approximately 730,000.
- 8) Some Alaskan citizens will preferentially seek naturopathic medical care.
- 9) 28 states do not currently license naturopaths.
- 10) 22 states license naturopaths.
*7 with no prescribing authority
*4 with minimal prescribing authority, (plus DC)
*1 with complicated formulary (MT)
*3 with collaborative agreement (CA, VT, ME)
*7 with extensive prescribing authority
*2 unknown, by my online research (UT and NH)
- 11) Given the above, it is a manipulation of statistics to say that Alaska is the only state on the west coast without naturopathic prescribing authority.
*In fact, the most populous state, California, requires a collaborative agreement.

*If we compare to the West, Nevada has no naturopath licensing, Colorado has minimal naturopathic prescribing authority, and Montana has created a complicated naturopathic formulary.

*Again, only 7 states possess the extensive naturopathic prescribing authority granted in the proposed SB 44.

12) Blanket naturopathic prescribing authority would give licensed naturopaths access to 20,000 FDA approved prescription medications, minus controlled substances and cancer chemotherapeutics.

*To consider controlled substances and cancer chemotherapeutics the only dangerous medications available by prescription is simple fallacy.

*We are not talking about just the commonly cited antibiotics, oral contraceptives, and blood pressure medications, but rather nearly the entire armamentarium of modern medicine.

*This list of prescription medications that would be allowed includes thousands of medications that are only used in the emergency, hospital, critical care, and specialized medical care settings (eg anticoagulants, thrombolytics, high potency antibiotics, vasopressors, antivirals, antiretrovirals, immunosuppressive medications, biologics and immunologics, among many others).

*Senator Giessel gave testimony during the Feb 23, 2023 Health and Social Services Committee Meeting that naturopaths “use a few” prescribed medications, “do not use a long list” of prescribed medications, and “a few treatments are needed from time to time.” However, the bill does not reflect this prescribing practice and would allow extensive prescriptive authority as outlined above.

*Dr Natalie Wiggins gave testimony during the Feb 23, 2023 Health and Social Services Committee Meeting that cancer chemotherapeutics were not included in the prescriptive authority of proposed SB44 because cancer therapy falls under a specialty. And yet, the broad prescriptive authority outlined in the bill would contain all specialty medications, minus controlled substances and cancer chemotherapeutics.

*Dr Clyde Jensen gave testimony during the Feb 23, 2023 Health and Social Services Committee Meeting that Naturopathic pharmacology and prescribing education is mostly outpatient based. However, the bill would allow extensive prescriptive authority as outlined above.

*Dr Jon Lieberman gave testimony during the Feb 23, 2023 Health and Social Services Committee Meeting recommending we open the prescriptive authority “carefully.”

*MD and DO physicians in the state of Alaska are granted this authority, while being overseen by the Alaska State Medical Board, a group with duly trained physicians with extensive Western medical knowledge who are charged to assure standards of care are met.

13) The educational and practical comparison of naturopaths to nurse practitioners and physician assistants are not equivalent. The cited numbers by the American Academy of Naturopathic Physicians do not take into account that:

*Nurse practitioners have a nursing degree and nursing experience including additional pharmacology coursework and practical use prior to nurse practitioner school.

*Physician assistants practice under a collaborative agreement.

14) My proposal to the working group for last year's legislative session was and remains that a naturopath seeking expanded scope of practice work under a collaborative agreement for their expanded scope of practice.

I contend that my suggested plan is the safest plan moving forward. It is a safe way to assure oversight not just by the State (which will undoubtedly have little to no actual oversight of the practice of medicine) but by colleagues working directly with those who seek to expand their scope. It is also the easiest and foregoes the creation of a complicated formulary like Montana.

To allow broad prescriptive authority of all prescription medications except controlled substances and cancer chemotherapeutics, without clear understanding of the prescriptive authority that would be given is dangerous legislation. Please research the 20,000 FDA approved prescription medications that you would be giving naturopaths access to.

To create a board of Naturopathy with only Naturopathic physicians overseeing prescribing habits is also dangerous due to the lack of western medical oversight (whether by the State Medical Board or Board of Pharmacy). A Board of Naturopaths overseeing naturopathic practice makes sense, whereas a board of naturopaths overseeing expanded scope of practice fails to.

For the safety of the state, please recognize that one does not accommodate the few to risk the many.

Please query the Alaska Association of Naturopathic Doctors and request to know how many of the currently practicing naturopaths in the State of Alaska are seeking expanded scope of practice. I would be interested to see what their current statistics are, given the previous results revealed during our 2021 working group, 3 out of 50.

As you are aware, the broad prescriptive, surgical, and ordering authority requested in this bill has failed to pass legislation in Alaska for well over a decade.

I would respectfully ask that you ask yourself the following:

Would you want your loved one to be seen in an outpatient naturopathic clinic and administered the medications listed above?

The current draft of the bill, as written, would allow just that.

Legislation must be designed to prevent a worst case scenario, not hope for the best.

This is why I have suggested the above collaborative plan. It is again the safest and simplest way to move forward, and other states have already established a precedent as outlined above.

In reference to the proposed bill:

Section 2 creates a bill that allows a board of 3 naturopaths and 2 public members to then control the practice of naturopathy in the state, whereupon the board can then further expand scope.

Section 4 does not allow a naturopath to practice in the state unless they seek prescribing authority. (contradicted in Sec.08.45.045 (2) (D). The overwhelming majority of naturopaths are not seeking expanded scope of practice, per the discussions of our 2021 working group. At that time 3 of the approximate 50 naturopaths in the state were seeking expanded scope of practice.

Sincerely,

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Family Physician

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<https://aanmc.org/licensure/>

<https://aanmc.org/comparing-nd-md-curricula/>

<https://naturopathic.org/page/RegulatedStates>

[FNMRA - Regulatory Authority Links](#)

Summary of Naturopathic Licensed States Prescriptive Authority:

AK no

AZ extensive

Ca modified

CO minimal

CT no

(DC minimal)

HI extensive

ID extensive

KS extensive, but iv/im meds with collaborative agreement

ME 1 yr collaborative agreement

MD, minimal (epipen, O2, barrier contraception)

MA no

MN no

MT complicated formulary

NH ?

NM extensive

ND no

OR extensive

PA no

RI no

UT?

VT 1 yr and until 100 prescriptions collaboration with physician with at least 5 years of experience prescribing in VT.

WA extensive

(Ontario extremely limited

BC extensive)

Naturopathic Formularies

Arizona and Oregon liberal

Connecticut: in process

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=ria&uact=8&ved=2ahUKEwjP0On5IZH2AhXUN30KHU3VCNcQFnoECCcQAQ&url=https%3A%2F%2Fportal.ct.gov%2F%2Fmedia%2FDepartments-and-Agencies%2FDPH%2Fdph%2Fpractitioner_licensing_and_investigations%2FScope-of-Practice-20-21%2FCNPA-Scope-of-Practice-Request.pdf&usg=AOvVaw3RnrZDqrxPAjNNOlxrjHnB

Maryland

[Allied Health | Naturopathic Formulary \(state.md.us\)](#)

Naturopathic Formulary

Pursuant to the Maryland Naturopathic Medicine Act (§14-5F, Health Occupations Article, Annotated Code of Maryland), licensed naturopathic doctors may:

- Administer natural medicines of mineral, animal, or botanical origin, including food, extracts of food, nutraceuticals, vitamins, amino acids, minerals, enzymes, botanicals and their extracts, botanical medicines, homeopathic medicines, and all dietary supplements and nonprescription drugs listed in the

formulary using various routes of administration, including oral, nasal, auricular, ocular, rectal, vaginal, and transdermal; **AND**

- Dispense or order natural medicines of mineral, animal, or botanical origin, including food, extracts of food, nutraceuticals, vitamins, amino acids, minerals, enzymes, botanicals and their extracts, botanical medicines, homeopathic medicines, and all dietary supplements and nonprescription drugs listed in the formulary that use various routes of administration, including oral, nasal, auricular, ocular, rectal, vaginal, transdermal, and intramuscular.

Nothing on the following formulary list restricts naturopathic doctors from administering, dispensing, or ordering the substances noted above.

Formulary List

Maryland licensed naturopathic doctors may prescribe, dispense, or administer the following[\[1\]](#):

1. **Prescription Auto-injectable Epinephrine**
2. **Prescription Oxygen**
3. **Prescription Diaphragms and Cervical Caps**
4. FDA-regulated Non-prescription Drugs
5. FDA-regulated Non-prescription Devices

California Licensure Requirements

[The California Naturopathic Doctors Association \(calnd.org\)](http://The California Naturopathic Doctors Association (calnd.org))

California naturopathic licensure requires (1) proof of having graduated from one of the four-year accredited naturopathic medical colleges, (2) a passing NPLEX score, (3) completion and submission of application for California licensure, which may be obtained from the Bureau of Naturopathic Medicine in Sacramento, CA. Licensure does not currently require passage of California specific board exams. Residencies are not a current requirement. More information can be found on the Naturopathic Medicine Committee's [License Applicants](#) page.

For further information about licensure in California as well as other frequently asked questions, be sure to check out our [FAQs page](#)! If our FAQs page and Scope page doesn't answer your question, please post it in our [private Facebook group for NDs](#)!

Scope of Practice

With the passage of SB907, NDs gained the ability to practice medicine in California. Although this was a great victory for our profession, in order to ensure that licensure occurred, we had to make some initial compromises. As a result, our ability to practice medicine to the full extent of our training is currently somewhat restricted, but we are working on changing this. In the mean time, here's what you need to know:

NDs Can:

- Identify themselves as doctors. (Un-licensable naturopaths may continue to call themselves naturopaths but may not use the terms ND or Naturopathic Doctor.)
- Perform physical exams, including gynecological exams
- Order lab tests as well as diagnostic and imaging studies
- Perform CLIA waved tests in office, such as urinalyses and pregnancy - however, this requires [applying for lab director status](#)
- Collect gynecological and venipuncture specimens
- Diagnose
- Treat with diet, herbs, nutrients, homeopathics, hydrotherapy, and neuromuscular technique Grades 1-4
- **Independently prescribe natural and synthetic hormones (although testosterone and HCG require a [DEA number](#))**
- **Under MD/DO supervision, prescribe legend and [Schedule IV-V controlled substances](#), and prescribe Schedule III drugs under a patient-specific protocol checked by a supervising MD or DO (find out more about [supervision and prescribing here](#)).**
- Dispense drugs or any other substances an ND is allowed to legally prescribe or furnish, as long as **all** specific requirements are met (labeling requirements, etc.)
- [Administer IV/IM/SC injections and IV preparations](#)
- [Hire Naturopathic Medical Assistants](#)

NDs Cannot:

- Identify themselves as physicians
- Prescribe Schedule I-II drugs. (These are largely drugs with high abuse potential such as heroin, cocaine and methamphetamines.) Cannabis is a Schedule I drug.
- Perform Grade 5 manipulations
- Perform or interpret diagnostic or imaging studies
- Suture
- Practice midwifery (unless they are also licensed midwives)
- Hire and give orders to medical personnel beyond naturopathic medical assistants

The legislative committee of the California Naturopathic Doctors Association consistently works on improving our scope of practice privileges to reflect a scope of practice that is consistent with naturopathic medical training. Long term goals include:

- Independent prescription privileges for legend and schedule III-V drugs
- Minor office procedures
- The ability to perform Grade 5 manipulations
- The ability to hire and give orders to nurses

Colorado

[Colorado CCR Document List \(state.co.us\)](#)

Naturopathic Doctors are registered by the state to practice naturopathic medicine under the “Naturopathic Doctor Act.” They are not permitted to perform the following acts:

- Prescribe, dispense, or administer any prescription medications or devices except:
- Epinephrine for anaphylaxis,
- Vitamins B6 and B12
- Barrier contraceptives (not including intrauterine devices),
- Oxygen for emergency use, and
- Vaccines in accordance with ACIP guidelines for patients who are at least eighteen years of age.
- Perform surgical procedures, including surgical procedures using a laser device.
- Use general or spinal anesthetics, other than topical and local anesthetics, including anesthetics with epinephrine.
- Administer ionizing radioactive substances for therapeutic purposes.
- Treat a child who is less than two years old, unless: (1) This form is fully completed and signed; (2) The most recent immunization schedule recommended by the Advisory Committee on Immunization Practices to the Centers for Disease Control and Prevention in the federal Department of Health and Human Services is provided to the parent or legal guardian with this form, (3) The Naturopathic Doctor develops and executes a written collaborative agreement with a licensed physician who is a pediatrician or family physician; and CODE OF COLORADO REGULATIONS 4 CCR 749-1 Office of Naturopathic Doctor Registration 24 (4) The Naturopathic Doctor provides a release of information to the parent or guardian requesting permission to exchange information and enter into a collaborative relationship with the child's licensed pediatric health care provider, if the child has one.
- Treat a child who is two years of age or older, but less than eight years of age, unless: (1) This form is fully completed and signed; (2) The most recent immunizations schedule recommended by the Advisory Committee on Immunization Practices to the Centers for Disease Control and Prevention in the federal Department of Health and Human Services is provided to the parent or guardian with this form; and (3) The Naturopathic Doctor provides a release of information to the parent or guardian requesting permission to exchange information and enter into a collaborative relationship with the child's licensed pediatric health care provider, if the child has one.
- Practice medicine, surgery, or any other form of healing other than Naturopathic Medicine.
- Practice obstetrics.
- Perform chiropractic services (spinal adjustments, manipulation, or mobilization). Naturopathic physical medicine, as described in section 12-250-103(13)(b), C.R.S., is permitted.
- Recommend the discontinuation of, or counsel against, a course of care, including a prescription drug that was recommended by another health care practitioner licensed in Colorado, unless the Naturopathic Doctor consults with the health care practitioner.

Connecticut

[CNPA-Scope-of-Practice-Request.pdf - CT.gov](#)

DC

[Naturopathic Physician Licensing | doh \(dc.gov\)](#)

Naturopathic plus antimicrobials

Hawaii

[NaturopathicFormulary051019.pdf \(hawaii.gov\)](#)

Extensive

Idaho

Extensive

[Section 24.33.04.022 - AUTHORITY TO PRESCRIBE, DISPENSE, ADMINISTER, AND ORDER, Idaho Admin. Code r. 24.33.04.022 | Casetext Search + Citator](#)

Section [24.33.04.022](#) - AUTHORITY TO PRESCRIBE, DISPENSE, ADMINISTER, AND ORDER

Naturopathic medical doctors are allowed to prescribe, dispense, administer, and order the following: (7-1-21)T

01. Laboratory and Diagnostic Procedures. Naturopathic medical doctors licensed under this chapter may perform and order physical examinations, laboratory tests, imaging, and other diagnostic tests consistent with primary care. (7-1-21)Ta. All examinations, laboratory, and imaging tests not consistent with primary care must be referred to an appropriately licensed health care professional for treatment and interpretation. (7-1-21)Tb. Any test result or lesion suspicious of malignancy must be referred to the appropriate physician licensed pursuant to Chapter 18, Title 54 Idaho Code. (7-1-21)T

02. Naturopathic Formulary. The formulary for naturopathic medical doctors licensed under this chapter consists of non-controlled legend medications (excluding testosterone) deemed appropriate for the primary health care of patients within the scope of practice and training of each naturopathic medical doctor.

Prescribing pursuant to the Naturopathic Formulary shall be according to the standard of health care provided by other qualified naturopathic medical doctors in the same community or similar communities, taking into account their training, experience and the degree of expertise to which they hold themselves out to the public. (7-1-21)T

03. Formulary Exclusions. The naturopathic formulary does not include: (7-1-21)T

a. Scheduled, controlled drugs, except for testosterone used in physiologic doses with regular lab assessment for hormone replacement therapy, gender dysphoria, or hypogonadism; (7-1-21)T

b. General anesthetics; (7-1-21)T

c. Blood derivatives except for platelet rich plasma; or (7-1-21)T

d. Systemic antineoplastic agents, except for the following antineoplastic agents used orally or topically for non-cancer purposes: (7-1-21)Ti. Fluorouracil (5FU); (7-1-21)Tii. Anastrozole; and (7-1-21)Tiii. Letrozole. (7-1-21)T

Idaho Admin. Code r. [24.33.04.022](#)

Kansas

[Doctors of Naturopathic Medicine \(N.D.\) \(ksbha.org\)](#)

Iv meds with collaborative physician

Naturopathy:

"A system of health care practiced by naturopathic doctors for the prevention, diagnosis and treatment of human health conditions, injuries and diseases, that uses education, natural medicines and therapies to support and stimulate the individual's intrinsic self-healing processes, and includes prescribing, recommending or administering:

1. Food, food extracts, vitamins, minerals, enzymes, whole gland thyroid, botanicals, homeopathic preparations, nonprescription drugs, plant substances that are not designated as prescription drugs or controlled substances, topical drugs as defined in subsection (i) of this section, and amendments thereto;"
2. "health care counseling, nutritional counseling and dietary therapy, naturopathic physical applications, barrier contraceptive devices;
3. "substances on the naturopathic formulary which are authorized for intramuscular or intravenous administration pursuant to a written protocol entered into with a physician who has entered into a written protocol with a naturopathic doctor licensed under this act;"
4. "noninvasive physical examinations, venipuncture to obtain blood for clinical laboratory tests and orofacial examinations, excluding endoscopies;"
5. "minor office procedures; and"
6. "naturopathic acupuncture. A naturopathic doctor may not perform surgery, obstetrics, administer ionizing radiation, or prescribe, dispense or administer any controlled substances as defined in K.S.A. 65-4101, and amendments thereto, or any prescription-only drugs except those listed on the naturopathic formulary adopted by the board pursuant to this act." [K.S.A. 65-7202\(b\)](#)

Maine

1 yr collaborative agreement

[Title 32, §12522: Scope of practice \(mainelegislature.org\)](#)

<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjP0On5IZH2AhXUN30KHU3VCNcQFnoECAkQAA&url=https%3A%2F%2Fwww.maine.gov%2Fsos%2Fcec%2Frules%2F02%2F502%2F502c006.doc&usg=AOvVaw391URMsIfKE68R9IXfkerF>

4. Prescriptive authority. Naturopathic doctors have a limited scope of prescriptive authority.

- A. A naturopathic doctor may prescribe nonprescription medications without limitation. [PL 1995, c. 671, §13 (NEW).]
- B. A naturopathic doctor may only prescribe noncontrolled legend drugs from the following categories: homeopathic remedies, vitamins and minerals, hormones, local anesthesia and immunizations that are designated by rule by a subcommittee of the board consisting of the naturopathic members, the pharmacist member and the allopathic or osteopathic physician member, as consistent with a naturopathic doctor's education and training. A naturopathic doctor may not prescribe psychotropic medications. [PL 1995, c. 671, §13 (NEW).]
- C. Prior to independently prescribing noncontrolled legend drugs, a naturopathic doctor shall establish and complete a 12-month collaborative relationship with a licensed allopathic or osteopathic physician to review the naturopathic doctor's prescribing practices. The board shall further define the terms of the collaborative relationship by rule. [PL 1995, c. 671, §13 (NEW).]

[PL 1995, c. 671, §13 (NEW).]

- 5. Prohibition.** A naturopathic doctor may not:

A. Prescribe, dispense or administer any substance or device identified in Schedule I, II, III, IV or V as described in the federal Controlled Substance Act, 21 United States Code, Sections 801 to 971 (1988), or any controlled substances or devices; [PL 1995, c. 671, §13 (NEW).]

Maine Naturopathic Formulary

Based on statute Title 32 Chapter 113-B and rule-making:

- A. Controlled substances, as specified in the Controlled Substances Act, may not be prescribed.
- B. Psychotropic medications may not be prescribed.
- C. IV medications, except rehydration, may not be administered.
- D. Medications which do not fall under the following categories of medications are listed at the end of this document.
- E. Categories of medications which may be prescribed:

- 1. Amino Acids: (IV use of amino acids excluded.) All amino acids and amino acid combinations to include but not limited to:

	Acetylcysteine	Glycine	Lysine	Taurine
	Alanine	Histidine	Methionine	Threonine
	Arginine	Hydroxyproline	N-	
acetylcysteine	Tryptophan			
	Aspartic acid	Isoleucine	Phenylalanine	Tyrosine
	Carnitine	Leucine	Proline	Valine
	Glutamic acid	Levocarnitine	Serine	

- 2. Analgesics: Topical analgesics.

- 3. Anesthetics: Local and topical anesthetics.

- 4. Antimicrobials: (IV use excluded.) All natural antibiotics means antimicrobial, antifungal and antiprotozoal agents that are naturally occurring substances or are manufactured substances that are substantially identical to those naturally occurring substances. Topical medicines means topical analgesics, anesthetics, antiseptics, scabicides, antifungals and antibacterials.

Cephalosporins	Tetracyclines
Macrolides	Topical antivirals
Oral antifungals	Topical fungicides
Oral antiparasitics	Topical and ophthalmic antibacterials
Penicillins and cillins	Topical scabicides and pediculoses

5. Antiseptics: Topical antiseptics.

6. Barrier Contraceptives

7. Bile Salts and Acids:

Chenodeoxycholic acid	Ursodeoxycholic acid
Dehydrocholic acid	Ursodiol

8. Botanical Medicines: (IV use of botanical medicines excluded.) All botanical extracts and their derivatives to include but not limited to:

Belladonna	Hyoscyamus
Caffeine	Podofilox
Chapparal	Podophyllin
Cineraria maritima	Pseudoephedrine
Colchicine	Quinine
Ephedra	Salicylates
Ergoloid mesylates	Sarapin
Ergotamine tartrate	

9. Corticosteroids: Topical corticosteroids.

10. Diagnostic Biologicals: Intradermal and topical preparations to include but not limited to:

Allergens	Mumps
Candida	Tuberculin (OT, PPD)

11. Enzymes: Oral and topical enzymes including debriding agents to include but not limited to:

Amylase	Hyaluronidase
Betaine HCl	Lipase
Bromelain	Pancreatin
Chymotrypsin	Pancrelipase
Dornase alpha	Papain
Glutamic HCl	Trypsin

12. Fluids: For IV hydration and injection:

Dextrose solutions	Saline solution
Dextrose and sodium chloride	Sterile water for injection
Lactated Ringers solution	

13. Homeopathic medicines: All prescription and nonprescription remedies.

14. Hormones: (IV use of hormones excluded.) Controlled anabolic steroids and growth hormones excluded.

Adrenal hormones

Adrenal cortical extract
DHEA
Hydrocortisone and its salts topical and OTC only
Mometasone furoate topical only
Pregnenolone
Triamcinolone and its salts topical only

Calcitonin

Estrogens -

Conjugated estrogens
Dienestrol
Esterified estrogens
Estradiol
Estrone
Estropipate
Ethinyl estradiol
Ethynodiol diacetate
Mestranol

Insulin Preparations

Oral Contraceptives

Progesterone and Progestins

Desogestrel
Medroxyprogesterone acetate
Norethindrone and salts
Norgestimate
Norgestrel
Progestins
Progesterone

Thyroid hormones

15. Immunizations: All immunizations and associated toxoids.

16. Minerals: (IV use of minerals excluded.) All prescription and nonprescription mineral and trace mineral preparations and their derivatives to include but not limited to:

Auranofin	Potassium compounds
Aurothioglucose	Trace mineral compounds -
Calcium compounds	Boron
Fluoride compounds	Chromium
Gold sodium thiomalate	Molybdenum
Iodine	Selenium
Iron salts	Silicon
Magnesium compounds	Vanadium
Manganese compounds	Zinc
Phosphorus compounds	

17. Vitamins: (IV use of vitamins excluded.) All prescription and nonprescription vitamin preparations and their derivatives to include but not limited to:

Vitamin A	Folic acid
Betacarotene and derivatives	Biotin
Thiamin (Vitamin B1)	Ascorbic acid (Vitamin C)
Riboflavin (Vitamin B2)	Vitamin D
Niacin (Vitamin B3)	Calcitriol
Pantothenic Acid (Vitamin B5)	Cacifediol
Dexpanthenol topical use only	Ergocalciferol
Pyridoxine (Vitamin B6)	Vitamin E
Cyanocobalamin (Vitamin B12)	Vitamin K
Hydroxycobalamin, with or without intrinsic factor	Menadiol CoQ10 (Ubiquinone)

18. Specific Medications:

Ammonium lactate
Anthralin
Caffeine
Cholestyramine
Clavulanate (compounds containing)
Coal tar
Epinephrine (For the treatment of anaphylaxis)
Epinephrine bitartrate (As a component of local anesthetics)
Guaifenesin
Nicotine preparations
Oxygen
Pseudoephedrine
Silver nitrate (As a styptic for topical use)
Sucralfate
Thymus extract
Tretinoin