

March 22, 2024

To: Alaska Senate Labor and Commerce Committee

Re: SB44

Chair Bjorkman and members of the Senate Labor and Commerce Committee,

My name is Bartholomew Grabman and I am writing to oppose Senate Bill 44.

I am currently a resident physician (MD) completing my three years in advanced training in emergency medicine, and plan to return to Alaska to practice medicine upon the completion of my residency training. Though this bill does not address MD education in Alaska, highlighting some of the differences between naturopathic and MD education may be helpful for understanding my opposition:

Naturopathic (ND) school includes 4,100 hours of training, with 1,200 hours of hands-on clinical education. Most pharmacology education is focused on herbal and natural remedies, with only very minimal training (3 credit hours) specifically on medications used in allopathic (western-based) care.¹ The class 'Minor Surgery,' which appears to be the only formal education for surgical procedures, is 1.5 credit hours.¹ NDs are not required to complete additional, advanced residency training.

During medical school at University of Washington (WWAMI [MD] program), I had weekly lectures on pharmacology for about 18 months. After this, I spent the next 2 years in clinical rotations, which included pediatrics, general surgery, psychiatry, anesthesia, neurosurgery, cardiology, family and internal medicine, obstetrics and gynecology, and geriatric medicine. I completed roughly 6,000 hours of clinical time in medical school, in addition to classroom-based education.

All physicians must complete a medical residency to be eligible for licensure. During residency, I work 50-60 hours per week for three years – accounting for another 8,000+ hours of direct clinical experience another year of additional advanced training. Though I am more than halfway through my residency training, I am still not allowed to practice or prescribe independently, as my knowledge base is not deep enough. I still consult our dermatologists (who have completed 4 years or specialized training in dermatological conditions) for questions regarding diagnosis and treatment of dermatological issues (including biopsies or minor surgeries), as these conditions are frequently too nuanced and complex for non-dermatologists to manage.

HB115 would allow NDs broad prescriptive authority, as well as the ability to perform minor surgical procedures, despite training that is focused almost exclusively on non-pharmacological and non-allopathic care. While NDs undoubtedly provide valuable care to their patients, the focus and training is very different from that of physicians. I would be unable to safely prescribe and perform traditional, non-allopathic medications and therapies – I believe the converse to be true of NDs. I urge you to **not** pass this bill as written.

Thank you,

Bartholomew Grabman, MD

Anchorage, AK

¹ Trimester-by Trimester, National University of Health Sciences. (Accessed March 27, 2024). <https://www.nuhs.edu/academics/naturopathic-medicine/trimester-by-trimester/>