



142 East Ontario Street, Chicago, IL 60611-2864 ph 312 202 8000 | 800 621 1773

March 8, 2010

Representative Kurt Olson  
Chair Labor and Commerce Committee  
State Capitol  
Juneau, AK 99801-1182

**Re: Vote “No” on HB 282 in the House Labor and Commerce Committee**

Dear Chairman Olson:

**The American Osteopathic Association (AOA) is writing to ask you to oppose HB 282 in Committee.** In addition to creating the Alaska Naturopathic Medical Board, this bill expands the scope of practice of naturopaths beyond their education and training. This bill would specifically allow naturopaths to: prescribe and administer prescription drugs, controlled substances, vaccines, hormones and medical devices; conduct medical imaging and laboratory examinations; perform pre-employment, school and workplace health examinations; perform minor surgeries; and refer to themselves as naturopathic physicians.

The AOA proudly represents its professional family of more than 67,000 osteopathic physicians (DOs); promotes public health; encourages scientific research; serves as the primary certifying body for DOs; is the accrediting agency for osteopathic medical colleges; and has federal authority to accredit hospitals and other health care facilities. More information on DOs and osteopathic medicine can be found at [www.osteopathic.org](http://www.osteopathic.org).

The AOA recognizes the role of allied health professionals in the U.S. health care system. However, expansion of allied health professionals' scopes of practice requires appropriate increases in education, clinical training and competency examination to ensure that care provided to the public is both safe and effective. HB 282 would create the Naturopathic Medical Board (NMB), which would consist of three naturopaths, one pharmacist and one public member who may, but is not required to be a physician. The NMB would have the authority to determine the list of prescription drugs, controlled substances, vaccines, hormones and medical devices that naturopaths can prescribe and administer. This is of concern given that naturopathic education consists of few contact hours

of study on pharmacology and provides virtually no clinical reinforcement of pharmaceutical interventions on patients during clinical training. Physicians (DOs and MDs) have extensive medical education and training that has prepared them to understand medical treatment of disease, complex case management and safe prescribing practices.

Furthermore, HB 282 allows naturopaths to perform minor surgeries defined to include “using operative, electrical or other methods for surgical repair and care incidental to superficial lacerations and abrasions or superficial legions and the removal of foreign bodies located in superficial tissues; and antiseptics or local anesthetics.” Naturopaths do not have adequate education and training to perform such procedures and allowing them to do so puts patients at risk. The bill also allows naturopaths to perform pre-employment, school and workplace health examinations. This is problematic as the failure to recognize an underlying health issue, such as a cardiac problem, could result in harm to patients. In addition, the bill allows naturopaths to order or conduct medical imaging and laboratory examinations. This could lead to patients being referred for the wrong tests, having to undergo additional scans or exams as ordered by a physician once the correct diagnosis is established, and ultimately increasing health care costs.

Our research indicates that naturopathic educational curriculum varies by school. There are six naturopathic schools, which are accredited by the Council on Naturopathic Medical Education (CNME). At most, the CNME requires a pharmacology course as part of the basic sciences requirement in the naturopathy curriculum.<sup>[1]</sup> In 2005, the CNME implemented an approval process for naturopathic residency programs. While opportunities are available for graduates of naturopathic schools to complete a one or two year residency, this training is optional. In addition, there are no standard requirements for naturopathy residency curriculum, rotations, or experiences. In terms of program content, all that is required by the CNME is that the resident receive 35 hours a year of didactic instruction, and participate in “scholarly activities that promote a spirit of inquiry, scholarship, and critical thinking such as discussions, rounds, study clubs, presentations, conferences, and local, regional, or national professional associations and scientific societies.”

The educational, post-graduate training and examination requirements for a physician are far more extensive than those of a naturopath. Prior to being admitted to medical school, a candidate must obtain a Bachelor’s degree. DOs complete four years of osteopathic medical school, which includes two years of didactic study and two years of clinical rotations. Clinical rotations in the third and fourth years are done in community hospitals, major medical centers, and doctors’ offices. Students learn osteopathic manipulative treatment (OMT) for prevention, diagnosis and treatment of disease. This is followed by three to seven years of postgraduate medical education, i.e., residencies, where DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.

The AOA also opposes HB 282 because it would allow a naturopath to use the title “doctor” or “physician,” which is misleading to the public. Traditionally, the terms “doctor” and “physician” were associated with the unrestricted practice of medicine or surgery. In patients’ minds, these terms indicate the completion of four years of medical school and several years of post-doctoral clinical residency. We believe that authorizing non-physicians to advertise themselves as “doctors” or “physicians” would result in confusion among patients.

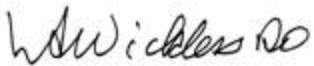
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<sup>[1]</sup> CNME, Handbook of Accreditation for Naturopathic Medicine Programs (2007).

It is our position that naturopaths' education and training is insufficient to justify the proposed increase in scope of practice. Unless naturopaths raise their educational and post-graduate training standards to match those of physicians, they should not be able to prescribe medicine, perform pre-employment, school and workplace health examinations, perform minor surgeries, order and conduct medical imaging and laboratory exams, and use the terms "physician" or "doctor." While increasing access to care for the patients of Alaska is of concern, allowing naturopaths to prescribe medication and perform these procedures would be detrimental to the quality and safety of patient care in the state.

I urge you to act in the best interests of patients by voting "No" on HB 282. We look forward to working with you on this important public policy matter. Please feel free to contact Andrea Garcia, JD, AOA Director of State Government Affairs, at [agarcia@osteopathic.org](mailto:agarcia@osteopathic.org) or (800) 621-1773 ext. 8185 should you require any additional information.

Sincerely,



Larry A. Wickless, DO  
President, AOA

CC: Karen J. Nichols, DO, President-Elect  
Norman E. Vinn, DO, Chair, Dept. of Government Affairs  
Joseph M. Yasso, Jr., DO, Chair, Bureau of State Government Affairs  
John B. Crosby, JD, Executive Director, AOA  
Michael Mallie, Associate Executive Director, Membership and Governance  
Linda Mascheri, Director, Dept. of State, Affiliate, Socioeconomic and International Affairs  
Amy Brengle, Executive Communications Coordinator  
Sally Podolski, Executive Director, Alaska Osteopathic Medical Association  
Anne Musser, DO, President, Alaska Osteopathic Medical Association

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