



March 31, 2021

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

Re: SB 38 - Response to AMA Opposition Letter re Practice of Naturopathy

Dear Chair Wilson:

The Alaska Association of Naturopathic Physicians (“AKANP”) submits this letter in response to the letter submitted by the American Medical Association (“AMA”) dated February 2, 2021 regarding SB 38 (the “Opposition Letter”). The AANP would like to address the AMA’s arguments against SB 38, defining the scope of practice for naturopaths in Alaska.

The Opposition Letter argues against the use of the term physician to describe Naturopathic Doctors. We agree that the appropriate usage of the term physician be limited to those individuals who have received a doctorate in the practice of medicine. The label “physician” helps the public recognize the level of knowledge and expertise that can be brought to bear in creating solutions to health problems. We disagree with the arbitrary and capricious exclusion of the doctorate earned by naturopathic physicians in the practice of medicine. Naturopathic physicians graduate from accredited universities. The programs are vigorous, competitive and train excellent practitioners who focus on treating the underlying problems.

The fundamental argument put forth by the AMA in the Opposition Letter is that the scope of practice for naturopaths should not be defined to include prescriptive privileges, unless naturopaths receive the exact same education and training as MDs and DOs. By this same reasoning, the ASMA would not support prescriptive privileges for other healthcare providers such as Nurse Practitioners, Physicians Assistants, Optometrists, and Dentists - all of which currently have prescriptive privileges in Alaska. The other healthcare providers with prescriptive rights do not receive the same education and training as MDs and DOs. The relevant question is not whether Naturopaths receive the exact same education and training as medical doctors. The appropriate question is whether the education and training of naturopaths is sufficient for the scope of practice defined in SB 38.

To this point we would reiterate that:

- An equivalent or broader scope of practice has been practiced safely by naturopaths in numerous other states for many years.
- Prescriptive privileges are currently provided to other healthcare providers in Alaska with equal or lesser pharmacology training.

In addition, the Opposition Letter presents a number of other specific problematic points which we have addressed below.

*NDs are not seeking the same scope of practice as MD and DO primary care physicians:* The AMA misinterprets the implications of SB 38. While SB 38 defines a clear scope of practice for NDs, it will not grant NDs the same scope of practice as MD and DO primary care physicians. For example, SB 38 would only allow naturopaths to prescribe non-controlled substances, excluding Ambien and Testosterone.

The arguments in the Opposition Letter against allowing ND's to perform surgery are facetious and misleading. They ignore the clear divide between major surgery and minor office procedures. Major surgery involves cutting into body cavities. Minor office procedure are limited only to the skin and include removing moles, warts and stitching or taping minor cuts. Nurse Practitioners, Physicians Assistants, Optometrists, and Dentists all currently have the right to perform minor office procedure in Alaska. ND's receive at least 30 hours of training in minor office procedures and sterile technique. Minor office procedures are a normal and customary part of the practice of naturopathy.

SB 38 will define the scope of practice for Naturopaths in Alaska in a manner that is consistent with their level of education and training. By doing so, it will provide Alaskans with greater access to primary health care providers, increase the freedom that Alaskans have to choose their preferred type of healthcare and will help reduce the cost of healthcare in Alaska. It will achieve these goals while still ensuring patient safety, as has been demonstrated in the many other states which currently provide Naturopaths with prescriptive privileges.

We believe the future of medicine is multiple professions working together with trust and respect toward the goal of improving the health of our populace. It is the hope and intention of the AKANP that this bill will further that vision.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Luper", followed by a long horizontal flourish line extending to the right.

**Scott Luper, President**

Alaska Association of Naturopathic Physicians

