

# White Paper on Modernizing the Scope of Practice for Licensed Naturopathic Doctors in Alaska

## Background

For decades, the Alaska Association of Naturopathic Physicians (AKANP) has advocated for allowing naturopathic doctors (NDs) in Alaska to practice in accordance with their education and training. These efforts have so far been thwarted by powerful medical lobbies, who refuse to collaborate, spread misinformation, and cite claims of malpractice that they have never been verified nor reported to the State.

Today, NDs in Alaska work under one of the more restrictive regulatory environments in the country. This leaves Alaskans with fewer choices, less healthcare access, and contributes to Alaska having some of the highest healthcare costs in the world.

The proposed scope of practice mirrors that which has been employed safely in many other states for decades. This would include the ability to prescribe non-controlled substance medications, perform minor office procedures, requirements for continuing education, in addition to updating numerous outdated statutes.

AKANP is requesting the Administration's consideration and support of this long-overdue reform.

## What is a Naturopath?

Currently there are less than 50 licensed and practicing NDs in Alaska.

### *Practice*

NDs are licensed primary care providers. While much of their training mirrors western medical training, NDs take a more personalized approach to identify and treat the underlying causes of illness and support a patient's own self-healing systems.

NDs generally allocate more time for routine office visits (typically an hour per visit), and focus on prevention and lifestyle-based medicine. They use similar diagnostic tools (such as labs and imaging) to other primary care providers but focus treatments on lifestyle modification, nutrition, and low risk intervention.

### *Education*

NDs complete a four-year, post-graduate, medical education from an accredited naturopathic medical school, which includes an in-residence, hands-on medical program consisting of a minimum of 4,100 hours of class and clinical training.

### *Residencies*

Residencies are less common among NDs because they are not trained to be hospitalists. As a result, residencies are not a requirement in most states and costs are not covered by federal programs. Nationwide there is a shortage of available naturopathic residencies. Despite this, many NDs in Alaska have completed a residency regardless of it not being a requirement of

licensure. Clinical rotations in the third and fourth years of medical school ensure that graduating NDs have significant clinical experience with patients.

Residencies are not required for other independent primary care practitioners who hold prescriptive privileges in Alaska, such as nurse practitioners and physician assistants.

### *Licensing*

An applicant for licensure in Alaska must have a doctoral degree from a naturopathic medical school accredited by the Council on Naturopathic Medical Education, the accreditation body recognized by the U.S. Department of Education.

### Who is *not* a Naturopath?

NDs have had to defend their profession against misappropriation and misunderstanding

There are basically two groups that confuse the issue of who is and who is not an ND: those who intentionally market and misrepresent themselves as NDs and those who, to no fault of their own, are mistaken as NDs. Both groups could include:

- Online certificate holders: Online programs have previously existed that grant the title of “naturopath” to unlicensed individuals with limited training. However, these individuals are not candidates to sit for board certification and are not licensed NDs.
- Health food store clerks
- Essential oil representatives
- Other, licensed healthcare providers (MD, DO, NP, PA, LMT) practicing “natural”, “alternative” or “holistic” medicine

### Scope of Practice / Modernization of Statutes

The statutes that govern NDs were put into place in the 1980s. Since that time there have been no substantial changes to the statutes.

Currently the statutory powers and duties given to the Division of Corporations, Business and Professional Licensing to oversee licensing of NDs is not adequate nor commensurate to other healthcare professionals practicing in Alaska. NDs do not have the same continuing education requirement and public health reporting duties as other healthcare professionals and the division does not have appropriate oversight for sanctioning in some investigation instances.

### Prescriptive Authority

Despite the fact that NDs complete a rigorous education in pharmacology during their four-year, science-based medical education, NDs in Alaska have no prescriptive authority. There are 14 other states that allow NDs full or limited prescriptive authority and the data shows that they are doing so safely and effectively. Currently other healthcare providers in Alaska who have less or the same level of pharmacology education and training are allowed to prescribe all substances.

There are many instances when pharmaceuticals are important to the health and wellbeing of patients. Antibiotics may be needed for an infection that does not respond to non-medication approaches. Women getting their annual exams often need renewed birth control prescriptions. Or, in the case where a patient makes progress on a chronic condition through diet

and lifestyle modification (e.g. diabetes, hyperlipidemia, hypertension, etc.), they may require lower doses of prescriptions they are already taking. In all of these examples, allowing NDs to prescribe medications removes the need for duplicative appointments with other health care providers in order to access prescriptions.

A modern scope of practice should include prescriptive authority. Past legislative attempts have limited authority by restricting the prescriptions of controlled substances and chemotherapeutic agents (chemotherapy).

## Vaccinations

In Alaska, NDs do not currently have the legal ability to order and administer immunizations. As a result, they cannot point to their work as evidence of our support for routine immunizations for the betterment of public health. The Naturopathic Academy of Primary Care Physicians has adopted a clear position endorsing the CDC immunization schedule. This is consistent with their training and ideal practices. Among other things, the position clearly states that:

*Naturopathic physicians are strong advocates of preventive medicine and protecting children and adults from adverse consequences of infectious disease, and therefore immunization is included under the naturopathic precept of Prevention. Naturopathic physicians are morally obliged and legally mandated to carry out public health laws including those with respect to immunization.*

As is the case for any medical practice, some patients who seek care from NDs may have personal opinions that differ from the medical recommendations on immunizations. However, those are not consistent with or endorsed by the standards of the naturopathic profession.

In the best interest of public health, NDs should be able to encourage and administer immunizations. Passage of legislation is necessary for NDs to be able to directly assist in vaccinating and immunizing Alaskans, including the COVID-19 vaccination.

## Conclusion

Modernizing statutes that govern and regulate NDs in Alaska would allow Alaskans more choice, increase healthcare access, decrease healthcare costs, and eliminate over-regulation that does not benefit the health and safety of Alaskans. It also allows a more effective management of this group of providers, by simply allowing them to do what they are trained to do.