

# Alaska State Medical Association

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April 8, 2021

The Honorable David Wilson, Chair  
Senate Health and Social Services Committee  
State Capitol, Room 121  
Juneau, Alaska 99801

Delivered via email: Senator.David.Wilson@akleg.gov

Re: Senate Bill 38 Naturopaths: Licensing; Practice

Dear Chair Wilson:

The Alaska State Medical Association (ASMA) represents physicians statewide and is primarily concerned with the health of all Alaskans.

ASMA opposes Senate Bill 38 and any expansion of naturopath's scope of practice beyond that which is currently found in AS 08.45.

Naturopaths essentially wish to have the same scope of practice as Primary Care Physicians (MDs and DOs). Naturopaths' education and training simply do not have comparable depth and breadth as that of an MD or DO and is inadequate for the expansion of scope contained within SB 38. The American Medical Association in its *AMA Scope of Practice Data Series Naturopaths 2018* stated it very clearly:

*The AMA recognizes that patients' access to care is a legitimate concern in the United States. However, actual or perceived workforce shortages in the medical profession cannot and should not be solved by exposing patients to health care providers whose education or training does not support the caregiving role they seek. Scope of practice expansions that are misaligned with practitioners' education and training are unlikely to be in the best interests of patients.*

ASMA understands the difficulty legislators are faced with when attempting to compare appropriate education and training for healthcare providers. However, it is critical to ensure appropriate licensing and definition of scope of practice as your decisions will communicate to patients an endorsement of the scope of practice and can result in patients being put in dangerous situations. Patient safety should be paramount.

## **Education:**

First and foremost, it is important to note that a naturopathic education is at its foundation based on Naturopathic theory and based on the healing power of nature where nature

heals through the response of the life force. So even courses that share a similar name or topic are taught from a different perspective.

Primary Care Physicians attend four years of medical school followed by three years of residency in an accredited residency program.

It is in the residency training where the physician really learns all aspects of patient care with hands-on experience in both the outpatient and inpatient (in hospital) settings. Compare the American Academy of Family Physicians required 3-year residency program for a Family Physician to the 1-year **optional** residency program for naturopaths. The hours respectively, are 9,000 to 10,000 versus 535 to 1,035. Furthermore, as few states allow prescriptive authority for naturopaths the optional residency may lack training in use of pharmaceuticals.

ASMA would suggest that if you need more information about Family Medicine residency programs you contact Harold Johnston, MD, who heads Alaska's own Family Medicine program.

Make no mistake, SB 38 would give Naturopaths greater independent prescription and surgery authority than M.D.'s and D.O.s coming out of medical school. After four years of naturopathic education with little to no hands-on patient experience SB 38 would allow a naturopath treat patients including prescribe all drugs, except controlled and chemotherapeutic agents, use poisons on patients and allow some surgeries. M.D.'s and D.O.'s would have an additional 9,000 to 10,000 hours of training with patients prior to practicing within the same scope independently.

### **Use of Physician:**

There is a nationwide effort by naturopath organizations to have naturopaths be considered "primary care physicians" a term recognized to represent traditional allopathic care from M.D.'s and D.O.'s. The desire by naturopaths to eschew promoting themselves as naturopaths and appropriate the term "physician" is at best a disingenuous attempt to equate alternative medicine with allopathic science-based medicine and at worst risks confusing patients who would not normally choose to see a naturopath mistakenly seeing one. If someone wants to be called a naturopath, they should study naturopathy; if they want to be a physician they should study at a medical school. ASMA opposes the use of the term "physician" by naturopaths.

### **State Oversight:**

There currently is no Board overseeing the naturopathic practices. Currently, employees of the Department of Commerce review and act on complaints against naturopaths. Up to this point naturopaths have been limited to traditional naturopathic practice which makes it fairly easy for state employees with little to no health care experience to regulate naturopaths. SB 38 does propose an advisory board. However, even with the advisory board it is concerning that naturopaths with little to no experience in allopathic care would be advising the Department over the significant expansion of scope of practice to include surgeries, prescription of drugs, and use of poisons on patients. ASMA believes it is wholly inappropriate for an advisory board of individuals without appropriate education and without the experience in practicing under the expanded scope to make determinations on the increased scope of practice. Under this scenario the actual scope of practice will likely

be set by individual naturopaths with no experience prescribing drugs or performing surgeries.

Immunizations. While we are confident that many naturopaths do support vaccination there are studies that raise concerns over vaccination rates from patients seeing naturopaths.

In February 2011 Alaska's Department of Health and Social Services released a bulletin with news that Alaska is now near the bottom in rates of childhood immunizations, based on a national survey done by the US Centers for Disease Control and Prevention (CDC). Alaska is 49<sup>th</sup> among all states, with a rate of immunizations of 56.6% compared with the national average of 70.5%. A University of Washington study reported in 2009 in the *Maternal and Child Health Journal* ("Pediatrics Vaccination and Vaccine Preventable Disease Acquisition: Associations with Care by Complementary and Alternative Medicine Providers," Volume 14, Number 6, 922-930, DOI: 10.1007/s10995-009-0519-5): "*Children were significantly less likely to receive each of the four recommended vaccinations if they saw a naturopathic care.*" Furthermore it stated "*Children aged 1-17 years were significantly more likely to be diagnosed with vaccine preventable disease if they received naturopathic care.*" It would seem that if the naturopathic standard of care for children does not include recommendations for parents to have their kids vaccinated for preventable illnesses, there is a gap in their knowledge base. Are there other gaps in naturopaths' standard of care for children?

ASMA will oppose bills such as SB 38 that expand the scope of practice for naturopaths beyond what is currently allowed in AS 08.45 until:

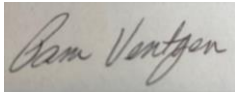
- (1) The U.S. and Canadian schools of naturopathy that grant doctoral degrees are accredited by the same accrediting bodies for the U.S. and Canadian medical schools: Liaison Committee on Medical Education (LCME) or the American Osteopathic Association (AOA), Commission on Osteopathic College Accreditation (COCA);
- (2) All candidates for admission to U.S. and Canadian schools of naturopathy are required to take the Medical College Admission Test (MCAT);
- (3) All graduates of U.S. and Canadian schools of naturopathy pass all three steps/levels of the United States Medical Licensing Examination (USMLE) or the Comprehensive Osteopathic Medical Examination (COMLEX – USA), using the same passing criteria as the MDs or DOs, respectively;
- (4) All naturopaths seeking licensure must successfully complete at least a three-year residency program that is accredited by the same accrediting body, Accreditation Council for Graduate Medical Education (ACGME), for MDs and AOA-approved residency programs for DOs;
- (5) All naturopaths are subject to the same standard of care criteria as MDs and DOs for licensing sanction actions and in litigation, including allegations of malpractice;
- (6) All naturopaths are required to report to the state the outcome of each malpractice or action for which damages have been or are to be paid, whether by judgment or settlement; and
- (7) The state reports all actions against a naturopath to the National Practitioner Data Bank.

Such requirements are appropriate to protect the public.

ASMA believes that patient safety and public health trump all other considerations – even workforce shortages, perceived or real. Additionally, ASMA feels that the Legislature in evaluating SB 38 and other issues involving scope of practice needs to adopt the judiciary’s highest standard of proof – that the extension of the increased scope of practice beyond a reasonable doubt will provide for the public’s safety.

ASMA urges you to oppose SB 38 and any other measure to expand the naturopath’s scope of practice beyond that which currently exists in AS 08.45.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Pam Ventgen".

Pam Ventgen, Executive Director  
Alaska State Medical Association

cc: Senator Scott Kawasaki