



March 21, 2023

Representative Justin Riffride, Vice Chair
House Health and Social Services Committee

RE: Support for Alaska HB 115, An Act relating to the practice of naturopathy

Dear Representative Ruffridge,

The American Association of Naturopathic Physicians (AANP), the national professional association representing Licensed Naturopathic Physicians, wholeheartedly supports Alaska HB 115. Naturopathic physicians (NDs) are trained and licensed as primary care physicians in Alaska. AK HB115 has been introduced to modernize the naturopathic physician scope of practice to authorize NDs to prescribe based on training and education and commensurate with primary care practice. AK HB115 reinforces and clarifies education qualifications and accountability, further protecting Alaska's citizenry and safeguarding its public health.

Additionally, there are multiple compelling reasons to support passage HB115.

- NDs are educated, trained, and qualified to diagnose and treat illness. NDs eligible for licensure in the 26 US Commonwealths, Districts, States, and Territories, are graduates of four-year, full-time, in-residence, doctoral level programs that are accredited by the Council on Naturopathic Medical Education (CNME), an accrediting agency recognized by the U.S. Department of Education. Graduates complete 4,100 hours in basic and clinical sciences, naturopathic philosophy, naturopathic modalities, and naturopathic medicine, and 1,200 hours of supervised clinical training. Graduates must then sit for the Naturopathic Physicians Licensing Examination (NPLEX).
- Naturopathic physicians are educated and trained in office minor surgery and office procedures, including repair of superficial wounds and removal of foreign bodies, cysts and other superficial lesions. Of the 26 regulated jurisdictions in the US, over 51% (13), expressly allow them to perform minor office procedures, which are commonly defined to include the removal of foreign bodies located in superficial tissues; and the use of antiseptics and local topical anesthetics in connection with minor office surgical procedures. Additionally, full scope of practice language includes the use of operative, electrical, or other methods for the repair and care of superficial lacerations, abrasions, and benign lesions.



- Naturopathic medicine reduces the financial burden on the healthcare system and overall cost of healthcare. Naturopathic physicians are already offering primary care services to Alaskans in rural and underserved communities, but are forced to refer patients to their MD counterparts for certain prescriptions, causing unneeded delay in care and duplication in health care costs. Eliminating the outdated restrictions on prescription rights for NDs will immediately provide patients in rural and underserved communities with access to an already-trained pool of primary care physicians, and with faster access to a primary care doctor when they might otherwise need to wait for weeks to get an appointment.
- NDs have been safely practicing as primary care providers in the US in the US for an average of 30 years, with two states licensing NDs for over 100 years. Arizona, Montana, Oregon, Utah, Vermont, and Washington have enacted full scope of practice acts that enable NDs to practice to the full extent of their education and credentialing, including prescribing controlled substances. Of the over 5,500 licensed NDs practicing in these regulated states, there have been a total of 62 disciplinary actions relating to prescribing between 2010 and 2022, compared to an average of 4000 MD/DOs receiving disciplinary actions by their state medical boards from 2011 - 2021¹.

AANP fully supports AK HB115 and efforts to modernize Alaska's ND licensure law.

Thank you for your time and consideration. Please call me at 202-849-6306 if you have questions.

Sincerely,

AANP Executive Director

¹ Physician Discipline, 2021, Federation of State Medical Boards. Retrieved 03.20.2023
<https://www.fsmb.org/u.s.-medical-regulatory-trends-and-actions/u.s.-medical-licensing-and-disciplinary-data/physician-discipline/>