

ALASKA LEGISLATURE COMMITTEE FILES, 2003-2004 0072

10902 HOUSE JUDICIARY



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February 6, 2004

FAX: 907 465-3922

Senate Judiciary Committee  
Butrovich 205  
State Capitol  
Juneau, AK  
Attn: Sen. R. Seekins, Chairman

Re: SB 300 – attorney lien amendment

Dear Chairman Seekins and Members,

SB 300 has been favorably reviewed by a broad range of practicing Alaskan attorneys who represent all sides of many different kinds of disputes. Just recently, at the February 4, 2003, regular monthly meeting of the Employment Law Section of the Alaska Bar Association, 22 attorneys from Fairbanks, Anchorage, Juneau, and Kotzebue discussed the draft, after hearing from tax and other experts. While the Section is not permitted to lobby or endorse legislation, I can represent that, of those present, not a single person voiced any objection to the bill;<sup>1</sup> all comments were favorable with regard to passage. A number of participants, in fact, recounted examples of unfair taxation of clients who had received fee awards and who were then obligated to pay over the fees to their attorneys without taking a corresponding deduction from their gross income. Other attorneys commented that the unfair taxation of fee awards drives up the cost of settlement for the opposing party.

This bill, if passed, would eliminate the current double taxation of fee awards, and will make fee awards taxable only to the recipient attorney, and not to the prevailing litigant. The bill makes the Alaska lien statute track the Oregon lien statute, which the federal Court of Appeals has held is effective to eliminate double taxation.<sup>2</sup> The bill appropriately recognizes that earlier-asserted liens of any origin will prevail over a later-filed attorney lien, and that a later-filed tax lien will even prevail over an earlier attorney

<sup>1</sup> Thus, these comments do not reflect the official position of the Alaska Bar Association. The Association has not taken a position, nor has it been asked to take a position.

<sup>2</sup> Banaitis v. CIR, 340 F.3d 1074 (9<sup>th</sup> Cir. 2003).

Schendel letter to Sen. Jud. Comm.

February 6, 2004

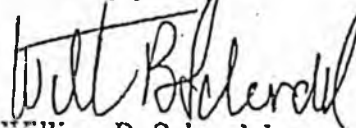
Page two

lien. By eliminating double taxation, this bill, if passed, will result in substantial savings to Alaskan citizens, whether plaintiffs or defendants.

I urge the passage of SB 300.

Thank you.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Will B. Schendel". The signature is written in a cursive style with a large, sweeping initial "W".

William B. Schendel  
Of Counsel

# Cook Schuhmann & Groseclose, Inc.

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February 5, 2004

VIA Facsimile 907-465-3922

Sen. Bert Stedman  
State Capital Room 30  
Juneau, AK 99801

Re: *Senate Bill 300: Attorney Lien Amendment*

Dear Senator Stedman:

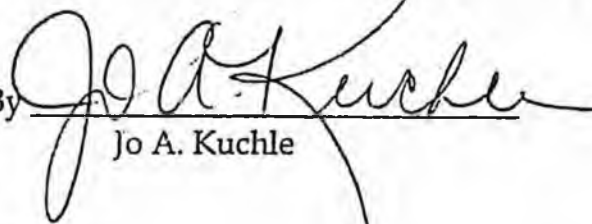
Thank you for introducing this important bill to eliminate the double taxation of fee awards on Alaskan taxpayers. The 9<sup>th</sup> Circuit Court of Appeals has held that on a recovery in a court proceeding, that portion subject to an attorneys fee award is taxable to the plaintiff/taxpayer. Then when the plaintiff pays the attorney, the income is taxed a second time. The 9<sup>th</sup> Circuit has recognized an exception in Oregon, where the attorney lien statute makes the portion owed to the attorney a superior lien. Based on that difference, Oregon taxpayers -- who are also in the 9<sup>th</sup> Circuit -- avoid the double taxation issue. The portion paying the attorney is taxed only to the attorney and not to the plaintiff/taxpayer.

Your legislation will help many Alaskan taxpayers avoid this often disastrous tax result. By amending Alaska's attorney lien statute to match Oregon's, this inequitable tax result should be avoided under the current 9<sup>th</sup> Circuit rulings. Thank you again.

Should there be any hearings before the Senate Judiciary Committee, please let me know the date and time as I would be willing to testify.

Sincerely,

COOK SCHUHMAN & GROSECLOSE, INC.

By   
Jo A. Kuchle

Senator Stedman	
Rec on:	219
Read Copy	
Sender's e-mail address:	
SENATOR	
jkuchle@alaska.gov	
MILEST	
IAN	
DICK	
Note:	By Fax 2/5

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February 6, 2004

Senator Bert Stedman  
Senate Judiciary Committee  
State Capitol  
Room 30  
Juneau, AK 99801

Re: SB 300; Attorney Lien Amendment

Via fax (original in mail): 907-465-3922

Dear Senator Stedman,

I would like to thank you for giving this legislation a hearing. It has the potential to fix what I consider to be grievous miscarriages of justice. Although the proposed legislation is quite simple, the story behind the need for this is a bit more complicated. If you have this information from other sources, please just consider this a message from a citizen speaking in favor of the bill.

If you need to know more about the issue I am happy to be of service. First I would like to give you some background on the Federal income tax consequences of an award to the plaintiff of attorney fees and litigation costs.

Both Alaska and Oregon lie under the jurisdiction of the Ninth Circuit Court of Appeals and the decisions of the Ninth Circuit control the decisions of the United States Tax Court for cases of taxpayers residing in the Alaska and Oregon. I realize you undoubtedly know this but it becomes very relevant to this legislation.

The Ninth Circuit in *Coady vs. Commissioner*, 85 AFTR 2d 2000-2049. (213 F.3d 1187), 06/14/2000 looked at a Federal income tax case, the result of which turned on Alaska law. Nona Coady was an employee of the Alaska Housing Finance Corporation. She lost her job and later prevailed in employment litigation and won an award for back wages and benefits lost as a result of wrongful termination. The issue with respect to their tax return for the year involved whether the Coadys needed to include in income the portion of the award that went to their attorneys. The Ninth Circuit indicated that the plaintiff must include the attorney fees in income.

Senator Stedman	
Rec on:	2/11
Read	Copy
SENATOR	
MILES	
IAN	
DICK	
Note:	By Fax 2/6/04



Businesses that receive damage awards or other lawsuit awards must also include the gross amount in income, but businesses are allowed to deduct all of their legal costs against the award so that they only pay tax on the net proceeds.

If tax law provided that damages in the employment context were taxed only to the extent of net proceeds we would not have a problem and the desperate need for your assistance. Unfortunately, the tax law does not tax the net proceeds of non-business cases, at least in Ninth Circuit cases dealing with Alaska, but rather taxes the entire award to the plaintiff. A limited deduction for attorney fees and litigation costs is allowed for regular tax purposes and no deduction at all is allowed for purposes of the alternative minimum tax. At least one taxpayer has tried to claim, under a reimbursement theory, a direct deduction of legal expenses against the gross award and been rejected by the Ninth Circuit. See *Biehl v. Com*, 92 AFTR 2d 2003-7280, (CA9)12/12/2003.

The alternative minimum tax is a tax computation which parallels the regular tax computation in many respects. All taxpayers are required to compute their tax liability under both systems and pay the government under the computation which produces the highest tax. The courts have repeatedly struck down arguments that the alternative minimum tax is unconstitutional or does not apply on other grounds. See *Banaitis v. Com*, 92 AFTR 2d 2003-5840, 340 F3d1081 (CA9, 8/27/2003)

One important area in which these two systems differ is in the treatment of miscellaneous itemized deductions related to employee business expenses. These deductions, authorized under Internal Revenue Code Section 67, are deductible to as itemized deductions to the extent they exceed 2% of adjusted gross income.

For alternative minimum taxes purposes however, Internal Revenue Code Section 56(b)(1)(A)(i) provides that "No deduction shall be allowed for any miscellaneous itemized deduction."

This means that the payment of attorney fees provides no benefit for purposes of the alternative minimum tax. This can create horrific consequences to a successful plaintiff. We have had situations in our practice where a successful plaintiff, after paying attorney fees and taxes, had paid out more in attorney fees and taxes than they received in gross proceeds.

In addition, we have seen cases where public interest litigants and the disadvantaged have successfully sued to stop illegal behavior. The award often times consists of 90-95% legal fees with a small amount of damages. In these instances the income tax liability greatly exceeds the damages. In some instances the inclusion in income, of money they did not get to keep, ended up causing problems with government programs and scholarships which look at gross income for eligibility. It ends up costing victims in this area more than just the tax bill when they win.

In a good example of this, which is public knowledge, in August 2002, the New York Times reported that a female police officer who was the victim of "reprehensible" sexual

harassment received an award of \$300,000 as well as legal fees of almost \$1 million. According to the story this victim will end up paying all of her \$300,000 award, as well as almost \$100,000 more, to settle income taxes due on the gross award. The defendant surely must have enjoyed reading how the winner in court lost it all plus thousands more to the IRS. See *Spina v. Forest Preserve District of Cook County*, 207 F. Supp. 2<sup>nd</sup> 764 (2002).

For a published case laying this out see *Alexander v. Com* 77 AFTR 2d 96-301 (72 F3d 938) (Ca1 1995) in which the successful (or more appropriately termed, unsuccessful) litigant received an award of approximately \$250,000 out of which \$245,000 was paid in legal costs. The First Circuit upheld the Tax Court and the Internal Revenue Service in finding that this "successful" plaintiff owed over \$57,000 in taxes on his net award of approximately \$5,000 due to the alternative minimum tax disallowing the entire amount of attorney fees as a deduction.

If the plaintiff in a Alaskan case were to succeed, the Internal Revenue Service would have the backing of the Tax Court and the Ninth Circuit Court of Appeals in finding that the plaintiff would be taxable on the entire gross award. A limited deduction for attorney's fees and litigation costs paid would be available for regular tax purposes and no portion of the attorney's fees or litigation costs would be deductible for alternative tax purposes.

Some other circuit courts of appeal have held for the taxpayer in these types of cases but the majority of circuit courts have held for the government.

In spite of a conflict between the Ninth Circuit opinion and those of other circuits (see *Cotnam* and *Clarks*), the United States Supreme Court denied a petition for certiorari on April 16, 2001. This means that we will not have a "once-and-for-all" decision settling the matter for the entire country.

The Ninth Circuit eliminated any doubt about the steadfastness with which they held their opinion when they subsequently decided the issue several more times in other cases. *Sinyard v. Com.* [88 AFTR 2d 2001-6037, 268 F3d 759 (CA9, 9/25/2001)] and *Benci-Woodward v. Com.*, [86 AFTR 2d, 2000-5404, 219 F3d 942 (CA9, 7/18/2000)]

Now, (Finally!, Thank you for your patience if you are still reading this at this point) we get to the possible solution to the problem.

The Ninth Circuit found that these cases turned on local (state) law. If state law provided that the debt (attorney's fees) was a valid debt of the plaintiff then a payment of this debt by the defendant would result in income to the plaintiff. The court stated their reasoning, perhaps most succinctly, in the *Sinyard* case when they stated that "If A owes B a debt, and C pays the debt on A's behalf, it is elementary that C's payment is income to A as well as to B."

The Ninth Circuit, in reviewing the laws of Alaska (Coady), Arizona (Sinyard) and California (Benci-Woodward) held that the laws of the state(s) made the successful plaintiffs the owners of the entire award. The attorneys with whom the plaintiffs had contingent fee agreements were considered debtors of the plaintiffs.


The importance of this distinction was borne out in *Banaitis v. Com.* 92 AFTR 2d 2003-5840, 340 F3d1081 (CA9, 8/27/2003) where the Ninth Circuit held that, under Oregon law, the attorneys in a successful plaintiff case were the lawful owners of their portion of the award. Therefore the payment of the plaintiff attorney by the defendant **did not** result in income to the plaintiff because the plaintiff did not owe the attorney a portion of the award. The plaintiff was considered to have dominion only over the gross award less the attorney fees and costs. The attorney, under Oregon law, had a sufficient bundle of rights to be deemed the owner of the attorney's portion of the award. Thus, the taxpayer in this Oregon case only paid tax on the net proceeds.

We know that much of Alaska law has been modeled on Oregon law. What we are proposing in this legislation is that Alaska law, in the area of attorney liens, be molded to match Oregon. We are not asking for any more than what Oregon law provides, in fact, we want **exactly** what Oregon has as law in this area. Since the Ninth Circuit has said that Oregon taxpayers are treated favorably because of the wording of their attorney lien law we hope that Alaskan taxpayers can also get favorable treatment if our law matches that of Oregon exactly.

Keep in mind that the attorney, in all cases, must also include the fees received in income. We are not proposing anything that would change the taxation of the attorney. We are trying to eliminate the double taxation of the same money.

I realize that the Supreme Court or Congress should settle this matter and that would really be my preference. Both the high court and Congress have been made aware of this issue and declined to deal with it. Therefore, I implore you to do for Alaskan taxpayers what the Federal government refuses to do for them. Please allow Alaskan taxpayers to pay income taxes only on what they get to keep and help eliminate the tax penalty for fixing injustices.

Respectfully,



Kevin J. Walsh, CPA, CVA

SB

306

# ALASKA STATE LEGISLATURE

Rep. Lesil McGuire, Chair  
Rep. Tom Anderson, Vice-Chair  
Rep. Jim Holm  
Rep. Dan Ogg  
Rep. Ralph Samuels  
Rep. Les Gara  
Rep. Max Gruenberg



State Capitol, Room 120  
Juneau, AK 99801-1182  
(907) 465-4990  
Fax (907) 465-6592

## House Judiciary Committee

### Memorandum

**To:** Jean Mischel, Leg. Legal  
**From:** Vanessa Tondini, Committee Aide  
House Judiciary Committee  
**Date:** May 9, 2004  
**Re:** CS Request

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Please create a work draft House Judiciary Committee Substitute for work order # 23-LS1572\U. A, SB 306, basically deleting all of the text in the bill and inserting language creating a task force in the legislative branch on the scope of practice of naturopathy substantively based on the attached language, but modeling it (conforming the structure) after other legislation creating task forces (see attached CSHB 180 (JUD) from the 22<sup>nd</sup> Leg.). I know this is a huge request, but the bill is scheduled to be heard in committee tomorrow, May 10 at 11:00 a.m. Use your best judgment if you have any questions on the specifics.

If you have any questions, please call me at 4990. Thank you!

The information attached to this memo is **CONFIDENTIAL** an/or privileged. It is intended to be reviewed initially by only the individual named above. If the reader of this Memorandum is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination, or copying of the information contained herein is prohibited. If you have received this in error, please immediately notify the sender by telephone and return this to the sender at the above address.

The legislature finds that the access to medical care in the state is limited.

Naturopaths have proposed that they can meet the needs of more patients.

In order to better understand issues relating to safety and scope of practice of naturopathy, the legislature hereby creates the Task Force on Naturopathic Scope of Practice.

The task force shall be co-chaired by the Chairs of the House and Senate Health, Education, and Social Services Committees. Members shall include: one member of a trade association of naturopaths; one member of the state medical association; one member of the state pharmacy association; one advanced nurse practitioner; a lay member of the state medical board.

The task force shall meet at least three times; participation may be telephonic, if necessary.

The task force shall address the following issues: comparable levels of education and training between naturopaths and medical doctors; appropriate scope of practice relating to the use of legend drugs by naturopaths; appropriate scope of practice for non-pharmacological treatments by naturopaths (e.g. minor surgery); structure and operations of collaborative protocols; issues relating to joint liability between collaborating practitioners, and other issues as members of the task force deem necessary.

The task force shall submit a report of their findings to the legislature by February 1, 2005.

THE  
FOLLOWING  
DOCUMENT(S)  
ARE  
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XXIV. Prescribing Authority (cont.)

State	Midwife	Optometrist	Emergency Medical Technician Paramedic	Naturopathic Doctor
Alabama	E	H	C	D
* Alaska	C, E	F, H	C	E
Arizona	E	A - Limited	E	H
Arkansas	E	A - Limited	E	E
California	E	H	C	E
Colorado	E	H*	E	E*
Connecticut	E	A	E	E
Delaware	E	A, G, H*	E	D
District of Columbia	B	A	C	E
Florida	E	A - Ltd. formulary	E	A*
Georgia	E	A - Ltd. formulary*	E	E
Guam	H*	H*	E	E
Hawaii	E	C, F, G	E	H*
Idaho	E	A	C	D
Illinois	D	F, G, H	E	E
Indiana	E	H - Ltd. formulary*	E	E
Iowa	E	A*	E	D
Kansas	E	H*	C	B
Kentucky	E	H*	C	E
Louisiana	H	H	E	D
Maine	A	H	C	H
Maryland	E	H*	E	E
Massachusetts	E*	H*	E	E
Michigan	E	C, F, H	E	D
Minnesota	E	H	C	D, E
Mississippi	C	H*	C	E
Missouri	E	E	E	E
Montana	E	A - Ltd. therapeutics	E	H
Nebraska	B*	A - Limited*	E	D
Nevada	E	H	E	E
New Hampshire	C	A*	C	H
New Jersey	B, H	H	E	D
New Mexico	A	A, H	E	E
New York	A*	A	C	E
North Carolina	B	A	E	E
North Dakota	A - Limited	H	E	D
Ohio	E	A - Limited	E	D
Oklahoma	H	A	E	E
Oregon	E	A - Limited	C	A*
Pennsylvania	E	F, G, H*	E	D, E
Puerto Rico	E	E	E	E
Rhode Island	E	H	C	D
South Carolina	E	A - Limited*	E	E
South Dakota	E	A - Limited	E	E
Tennessee	E	A	E	E
Texas	C	A - Ltd. formulary	C	D
Utah	D	H	D, E	A*
Vermont	B*	G	C	H*
Virginia	E	A, H	E	E
Washington	C	F, G	C	H*
West Virginia	E	H	C	E
Wisconsin	E	H	E	E
Wyoming	E	H	C	D

\* See "Footnotes (\*)" on pages 69-72.

**XXIV. Prescribing Authority (cont.)**

2002-2003  
National Association  
of Boards of Pharmacy

**Survey of  
Pharmacy  
Law**

Medical Doctors have unlimited, independent prescribing authority in every state.

Doctors of Osteopathy have unlimited, independent prescribing authority in all states, except Puerto Rico where they have no prescribing authority.

Doctors of Dental Surgery, Doctors of Podiatric Medicine, and Doctors of Veterinary Medicine have independent prescribing authority that is limited to their course of practice in every state.

Doctors of Chiropractic have no prescribing authority in any state.

**LEGEND**

- A — Independent Authority.
- B — Dependent Prescribing Authority.
- C — Use Only.
- D — Not Licensed.
- E — No Prescribing Authority.
- F — Diagnostic Only.
- G — Therapeutics.
- H — Limited Prescribing Authority.

**Footnotes (\*)**

AK — Advanced Nurse Practitioners may prescribe and dispense within the scope of their specialty.

AZ — Homeopathic Physician has prescriber authority. Title of "Clinical Nurse Specialist" not used.

AR — "Advanced Practice Nurses" must be certified under rules promulgated by the Board of Nursing and Medical Licensing Board. When certified, they will have dependent authority. Must have collaborative agreement with physician and may only prescribe within the scope of the physician's practice.

CA — Dependent prescribing authority for Certified Nurse Midwife and Certified Nurse Practitioners. Dependent prescribing authority for Pharmacists in licensed health facilities, clinics, health maintenance organizations, and providers contracting with HMOs in accordance with policies, procedures, or protocols.

CO — Homeopathic Physicians have prescriptive authority if they are a Medical Doctor or Doctor of Osteopathy. A Naturopathic Doctor would have no such authority, except for vitamins, minerals, etc. Advanced Practice Nurses have independent authority if they are approved by the nursing board, have obtained a DEA number, and maintain a collaborative agreement with a physician licensed in Colorado whose background and active practice corresponds with that of the nurse. Optometrists may purchase, possess, administer, and prescribe certain

pharmaceutical agents for examination and treatment if they are therapeutically certified by the Optometric Examiners Board.

CT — Advanced practice nurses have independent authority if they are licensed as APRNs, have obtained a DEA number, and maintain a collaborative agreement with a physician licensed in Connecticut whose background and active practice corresponds with that of the nurse practitioner, pediatric nurse practitioner, psychiatric nurse practitioner, and certified nurse anesthetist all fall under the category of advanced registered nurse practitioner.

DC — Only nurse practitioners, clinical nurse specialists, nurse midwives, and nurse anesthetists who are licensed by the DC Board of Nursing as an advanced practice registered nurse have independent prescribing authority.

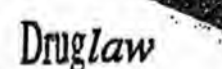
DE — Advanced Practice Nurses must be licensed by the Board of Nursing and must submit a collaborative care agreement to the Joint Practice Committee. Optometrists must be therapeutically certified to prescribe.

FL — For Physician Assistants, there exists a limited formulary. Advanced Registered Nurse Practitioners may initiate orders under protocol. Naturopathic Doctors have unlimited prescribing authority.

GA — Optometrists may prescribe from a specific formulary.

GU — Optometrists may prescribe from a limited formulary. APRNs must have collaborative practice agreement with MD.

HI — Naturopathic Doctors may prescribe vitamins, minerals, amino acids, and fatty acids. Rules exclude the prescribing by PAs of controlled substances and also require that the supervising physician retain full professional and legal responsibility for PA performance, care, and treatment of patient. Pharmacists may adjust dosage regimens pursuant to



*Druglaw*

Legend continues on page 70

2002-2003  
National Association  
of Boards of Pharmacy

# Survey of Pharmacy Law

## XXIV. Prescribing Authority (cont.)

### Footnotes (\*) - (cont.)

- prescriber authorization. Effective July 1, 1997, therapeutically certified optometrists shall not prescribe, dispense, or administer oral pharmaceutical agents except those available without a prescription. Only the use and prescription of topical therapeutic pharmaceuticals as established by the Joint Formulary Advisory Committee are allowed.
- ID** — Physician Assistants, Nurse Practitioners, Certified Nurse Midwives, Clinical Nurse Specialists, and Registered Nurse Anesthetists all have independent prescribing authority limited to scope of practice and must be approved to prescribe by their respective boards.
- IN** — "Advanced Practice Nurses" must be certified under rules promulgated by the Board of Nursing and Medical Licensing Board. When certified, they will have dependent authority. Must have collaborative agreement with physician and may only prescribe within the scope of the physician's practice. The state does not necessarily recognize each listed nursing specialty. Hospital and private mental institutional Pharmacists may adjust drug therapies pursuant to protocol and under the supervision of a physician. Optometrists must be certified by a committee of the Pharmacy Board and use formularies to prescribe. They may not prescribe for controlled substances.
- IA** — "Certified" Clinical Nurse specialists, "Certified" Nurse Midwives, and "Certified" Nurse Practitioners (Advanced Registered Nurse Practitioner classifications) have independent prescribing authority. PAs must have supervising physician and prescriptive authority; does not include CII stimulants or depressants. Three classes of Optometrists: 1) Plain Optometrists cannot use drugs at all; 2) Certified Optometrists can use some drugs for diagnostic purposes only; 3) Therapeutically Certified Optometrists can prescribe, but not dispense (except at no charge to commence a course of therapy), a select group of drugs including: a) topical and oral antimicrobial agents, b) oral antihistamines, c) oral antiglaucoma agents, d) topical pharmaceutical agents, and e) oral analgesic agents; f) oral steroids (with limitations).
- KS** — Three separate licenses for Optometry; one allows prescriptive authority of topical, diagnostics, and certain oral medications. Naturopathic doctor may prescribe pursuant to a protocol with a physician.
- KY** — Pharmacists may initiate, continue, or discontinue drug therapy pursuant to an established collaborative care agreement. Pharmacists who enter into a collaborative care agreement with a practitioner may cooperatively manage a patient's drug-related health care needs. The agreement shall be limited to specification of the drug-related regimen and necessary tests; stipulated conditions for initiating, continuing, or discontinuing drug therapy; and directions concerning the monitoring of drug therapy and conditions warranting dose, dosage regimen, dosage form, or route of administration modifications. Advanced Registered Nurse Practitioners (ARNPs) who prescribe must enter into a written collaborative practice agreement with a physician that defines scope of prescriptive authority. ARNPs cannot prescribe controlled substances. Optometrists may prescribe diagnostic topical medications for use in the eye or its appendages. "Therapeutically Certified" Optometrists may prescribe oral medications, except C-I and C-II controlled substances, for any condition that an Optometrist is authorized to treat under KRS 320. The authority to prescribe C-III, IV, and V controlled substances shall be limited to prescriptions for a quantity sufficient to provide treatment for up to 72 hours. No refills of prescriptions for controlled substances are allowed. Physician Assistants cannot prescribe controlled substances.
- MD** — Certified Registered Nurse Practitioners (including specialties) and Nurse Midwives may only prescribe within their specialty. Nurse Midwives have limited formulary. A therapeutically certified optometrist may prescribe under certain conditions.

Legend continues on page 7

## XIV. Prescribing Authority (cont.)

2002-2003

National Association  
of Boards of PharmacySurvey  
of  
Pharmacy  
Law

Notes (\*) - (cont.)

- MA — Massachusetts only recognizes Registered Nurse Practitioners. Clinical Nurse Specialist prescribing authority is for Psychiatric Nurse Specialists only. Nurse Midwife prescribing authority is for Certified Nurse Midwife only. Optometrists may prescribe topical Schedule VI drugs for use in the eye, but may not prescribe glaucoma medications.
- Optometrists may prescribe topicals only, for diseases of the eye and its adnexa.
- Must have a collaborative practice arrangement with a physician.
- Nurse Practitioner, Pediatric Nurse Practitioner, Psychiatric Nurse Practitioner, and Certified Nurse Anesthetist all fall under the category of Advanced Registered Nurse Practitioner.
- Doctors of Homeopathy use naturopath formulary. APRN, CNM, and CRNA must be RNs. Optometrists may prescribe topical ocular pharmaceutical agents and oral medication that is within their scope of practice.
- NM — The Board of Nursing determines by certification which specialties have prescriptive authority. Certified nurse midwives prescribe pursuant to Dept. of Health rules. For pharmacist clinicians only - in accordance with the New Mexico Pharmacist Prescriptive Authority Act.
- NY — "Nurse Practitioners" are authorized to issue prescriptions in accordance with practice agreements and practice protocols between the physician and nurse practitioner. Effective 1994, implementation of the Midwifery Practice Act resulted in licensure of professional Midwives.
- ND — Pharmacist's prescribing authority based on a collaborative practice agreement with a physician.
- OH — Advanced Practice Nurses licensed by the Nursing Board may prescribe drugs under certain conditions and within a limited formulary.
- OR — Nurse Practitioners may prescribe independently, but only for drugs allowed by formulary for their area of practice. Naturopaths may only prescribe, administer, and dispense non-poisonous plant and animal substances as determined by a formulary council in therapeutic dosages; they may administer select anesthetics, antiseptics, and radiopaque substances.
- PA — Physician Assistants and Nurse Practitioners based on formulary and written agreement with supervising physician. Please contact the Medical Board and/or Nursing Board for specific requirements and current status of laws/regulations. Optometrists - additional requirements for a Board of Optometry therapeutic license.
- RI — Nurse Midwives must be Certified Nurse Midwives in order to prescribe, and Nurse Practitioners must be Certified Nurse Practitioners in order to prescribe. Optometrists limited to topical ophthalmics.
- SC — Physician Assistants are certified by Board of Medical Examiners for prescriptive authority and formulary. Extended role of Nurse Practitioner certified by Nursing Board; under approved protocol from Nursing Board. Optometrists are therapeutically certified by the Board of Examiners in Optometry for limited prescriptive authority.
- SD — A statute passed in 1993 allows Pharmacists to initiate or modify drug therapy by protocol or other legal authority established and approved within a licensed health care facility or by a practitioner authorized to prescribe drugs.
- TN — Certified Nurse Practitioners have dependent prescribing authority.
- TX — Physician Assistants and Registered Nurses who have advanced training may prescribe dangerous drugs per protocol with a practitioner. Physician Assistants must be recognized by the Medical Board and have specialized training and education. Registered Nurses must be recognized by the Nursing Board and have specialized training and education. Pharmacists may perform specific acts relating to drug therapy management under written protocol from a practitioner.
- UT — APRNs can prescribe C-II's and C-III's with consultation. Naturopathic Doctors must prescribe pursuant to a specific formulary.
- VA — In VA, nurse practitioners, including nurse anesthetists and nurse midwives as well as other specializations of nurse practitioners are licensed as "nurse practitioners." "Prescriptive authority" is an add-on to the nurse practitioner license. As of July 1, 2000, nurse practitioners with prescriptive authority

Legend continues on page 72

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2002-2003  
National Association  
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## Survey of Pharmacy Law

### XXIV. Prescribing Authority (cont.)

#### Footnotes (\*) — (cont.)

will be able to prescribe and possess C-Vs only after they obtain a DEA registration. On January 1, 2002, C-IVs will be added. On July 1, 2003, C-III's will be added. "Prescriptive authority" is an add-on to the physician assistant license. As of July 1, 2001, physician assistants may prescribe and possess C-Vs after obtaining a DEA registration. On January 1, 2003, C-IVs will be added.

VT — Contact the Board of Nursing for specific prescribing requirements. Naturopaths may prescribe pursuant to their formulary.

WA — "Clinical Nurse Specialist" is not a recognized designation in this state. All other nurse practitioners are included in ARNP classification. ARNPs have independent authority for CV and legend drugs.

Collaborative agreement with physician required for CII-IV. Naturopathic Practitioners may prescribe a limited number of legend drugs, including vitamins, mineral whole gland thyroid, Vitamin B<sub>12</sub> prep, antibiotics, corticosteroids, etc. (List available from Washington State Board of Pharmacy.) They may not prescribe controlled substances.

WY — Prescribing authority only for those designated as Certified Advanced Nurse Practitioner. May be certified in specialty areas indicated with an asterisk (\*). Certified Advanced Registered Nurse Practitioner may now prescribe controlled substances (CS II-V). Certification must be done with Nursing Board and requires additional education and testing to regular Advanced Nurse Practitioner.

### XXV. Dispensing Authority (cont.)


State	OB/GYN Nurse Practitioner	Pediatric Nurse Practitioner	Psychiatric Nurse Practitioner	Optometrist	Naturopathic Doctor
Alabama	Yes	Yes	Yes	Yes	No
Alaska	No A	No A	No A	Yes B	No
Arizona	Yes	Yes	Yes	Yes B	Yes B
Arkansas	No	No	No	No	No
California	Yes TT	Yes TT	Yes TT	Yes	No
Colorado	No	No	No	No	Yes G
Connecticut	Yes A	Yes A	Yes A	Yes	Yes B
Delaware	Yes J	Yes J	Yes J	Yes J	No
District of Columbia	Yes UU	Yes UU	Yes UU	Yes	No
Florida	No	No	No	Yes	Yes
Georgia	Yes K	Yes K	Yes K	Yes	No
Guam	Yes S	Yes S	Yes S	Yes B	Yes
Hawaii	No	No	No	Yes	No I
Idaho	QQ	QQ	QQ	Yes D	No
Illinois	Yes W	Yes W	Yes W	No	No
Indiana	Yes NN	Yes NN	Yes NN	Yes B	No
Iowa	No N	No N	No N	No VV	No
Kansas	No	No	No	Yes B	No
Kentucky	Yes V	Yes V	Yes V	Yes B	No
Louisiana	No	No	No	No	No
Maine	Yes	Yes	Yes	Yes	Yes
Maryland	Yes O	Yes O	No	No	No
Massachusetts	Yes Q	Yes Q	Yes Q	Yes Q	No
Michigan	Yes RR	Yes RR	Yes RR	Yes SS	No
Minnesota	Yes	Yes	Yes	No	No
Mississippi	No	No	No	Limited	No
Missouri	Yes T	Yes T	Yes T	Yes R	No
Montana	U	U	U	U	U
Nebraska	Yes V, W	Yes V, W	Yes V, W	Yes	N/A
Nevada	No	No	No	Yes	No
New Hampshire	Yes	Yes	Yes	Yes B, X	Yes B
New Jersey	—	—	—	No	—
New Mexico	Yes	Yes	Yes	Yes	N/A
New York	Yes H	Yes H	Yes H	Yes H	No
North Carolina	Yes Y	Yes Y	N/A	No	No
North Dakota	Yes	Yes	Yes	No	No
Ohio	Yes R, O	Yes R, O	Yes R, O	Yes O	No
Oklahoma	No	No	No	No	No
Oregon	No AA	No AA	No AA	Yes	Yes
Pennsylvania	PP	PP	PP	Limited	No G
Puerto Rico	No DD	No DD	No DD	No DD	No DD
Rhode Island	No A	No A	No A	Limited, P	No
South Carolina	No	No	No	No	No
South Dakota	No	No	No	Yes	No
Tennessee	Yes	Yes	Yes	Yes	No G
Texas	Yes FF	Yes FF	Yes FF	Yes B	No
Utah	No	No	No	No	No
Vermont	Yes	Yes	Yes	Yes	Yes B
Virginia	No GG	No GG	No GG	No	No
Washington	Yes II	Yes II	Yes II	Yes	Yes
West Virginia	JJ	JJ	JJ	JJ	JJ
Wisconsin	No	No	No	No	No
Wyoming A	No	No	No	No	No

**XXV. Dispensing Authority (cont.)****LEGEND**

- A** — Any Nurse Practitioner must be advanced to dispense. (WY — And certified.)
- B** — Limited formulary.
- C** — "Yes" if also a Nurse Practitioner.
- D** — With special permit only.
- E** — Except may dispense samples.
- F** — Registered Nurse may dispense in clinic.
- G** — Not licensed by this state.
- H** — All prescribers are subject to restrictions on dispensing. Contact Board office.
- I** — Naturopathic Doctors are only allowed to prescribe and dispense prescription drugs that are vitamins, minerals, amino acids, and fatty acids.
- J** — Only if approved by the Board of Medical Practice.
- K** — Only by accordance with Pharmacy Board rules via a signed dispensing procedure and under the authority of a job description (PAs) or a nurse protocol.
- L** — Per ARNPs with prescriptive authority formulary.
- M** — Physician Assistants may only "supply" drugs.
- N** — However, "Certified" Clinical Nurse Specialists, "Certified" Nurse Midwives, and "Certified" Nurse Practitioners (Advanced Registered Nurse Practitioner classifications) may do so.
- O** — Under specified conditions, such as certain clinics.
- P** — Topical ophthalmics.
- Q** — A practitioner in Massachusetts may "dispense" a Schedule VI prescription drug pursuant to specific guidelines or for immediate treatment of his or her patient. Otherwise prohibited by State Controlled Substance Act.
- R** — May dispense only to his/her own patients.
- S** — Based on National Specialty Scope of practice.
- T** — Under authority of collaborative practice arrangement with doctor and limited to 72-hour supply.
- U** — MCA 37-2-104. Dispensing of drugs by medical practitioners unlawful — exceptions. (1) Except as otherwise provided by this section, it is unlawful for a medical practitioner to engage, directly or indirectly, in the dispensing of drugs. (2) Nothing in this section prohibits: (a) a medical practitioner from furnishing a patient any drugs in an emergency; (b) the administration of a unit dose of a drug to a patient by or under the supervision of such medical practitioner; (c) dispensing a drug to a patient by a medical practitioner whenever there is no community pharmacy available to the patient; (d) the dispensing of drugs occasionally, but not as a usual course of doing business, by a medical practitioner; (e) a medical practitioner from dispensing drug samples.
- V** — Samples only. (KY - noncontrolled substances.)
- W** — When acting as agent of physician.
- X** — Only TPA-certified Optometrists.
- Y** — Under rules of the Board of Pharmacy.
- Z** — Except emergency medications.
- AA** — Except in rural areas and student health centers and family planning clinics.
- BB** — May dispense drugs or devices that are the lawful property of the practitioner or a partnership or corporate entity which is fully owned by licensed practitioners. Drugs or medicine dispensed must comply with the labeling requirements of state and federal laws and regulations.
- CC** — Limited to veterinary products.
- DD** — Pharmacy Act allows only pharmacists to dispense prescriptions.
- EE** — Except for Veterinarians, dispensing is severely restricted. Contact the Board office.
- FF** — Physician Assistants (PAs) and Registered Nurses (RNs) who have advanced training may dispense their supervising physician's samples only. RNs must be recognized by the Nursing Board. PAs must be recognized by the Medical Board. Both must have specialized training and education.
- GG** — Except if allowed to prescribe, may dispense manufacturer's samples only of those drugs authorized to prescribe.
- HH** — Except for samples, must be licensed by Board of Pharmacy.
- II** — Included in Advanced Registered Nurse Practitioner classification. CII-IV limited to 72 hours.
- JJ** — State pharmacy law and Board regulations do not apply to these occupational groups. The Boards of Medicine, Osteopathy, Dental, Veterinarian, Registered Professional Nurses, and Optometry regulate these various occupational groups.
- KK** — Drug samples in towns with pharmacies; however, they can dispense prepackaged medicines that have been packaged by someone licensed to do so (i.e., Pharmacist) in rural settings where no pharmacy is available.
- LL** — Only if certified.
- MM** — If licensed to prescribe, may dispense only items on their protocol.
- NN** — "Advanced Practice Nurses" presumably have dispensing authority, although it is not explicitly authorized. The state does not necessarily recognize each listed nursing specialty.
- OO** — No such designation in this state.
- PP** — Limited, based on formulary and written agreement with supervising physician.
- QQ** — Certified Nurse Midwives, Clinical Nurse Specialists, Nurse Practitioners, and Registered Nurse Anesthetists may dispense (C-II only in an emergency).
- RR** — Under delegation and restrictions apply.
- SS** — Limited drugs.
- TT** — PAs and all NPs may provide medication pursuant to a protocol with a prescriber if prepackaged by the manufacturer, physician, or pharmacist.
- UU** — Only nurse practitioners, clinical nurse specialists, nurse midwives, and nurse anesthetists who are licensed by the DC Board of Nursing as an advanced practice registered nurse have dispensing authority.
- VV** — Therapeutically certified optometrist may supply without charge limited diagnostic and therapeutic agents.

2002-2003  
National Association  
of Boards of Pharmacy

# Survey of Pharmacy Law



DrugLaw

Frank H. Murkowski, Governor



**Division of Occupational Licensing**

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March 8, 2004

The Honorable Frank H. Murkowski  
Governor of Alaska  
Post Office Box 110001  
Juneau AK 99811-0001

Governor Murkowski, the Alaska State Medical Board urges you and your colleagues in the legislature to defeat House Bill 434 and Senate Bill 306 relating to the practice of "naturopathic medicine" in Alaska.

In a recent teleconference meeting, board members were unanimous in their strong opposition to the proposed legislation for a variety of reasons.

The principles of naturopathy are based on the belief that the body is self-healing, that the patient's "vital force" is restored by ridding the body of "toxins." As scientists, we find this simplistic approach to human ailments to be in direct conflict with the science-based knowledge of body physiology and pathology as taught to allopathic medical physicians (M.D.s) and osteopathic physicians (D.O.s). The danger of this approach is that patients with serious diseases will rely solely on the treatments provided by practitioners of naturopathy ignoring the treatments proven to be safe and effective by a science-based medical physician.

In 1968, in a report entitled "Independent Practitioners under Medicare," the United States Department of Health, Education, and Welfare concluded:

"Naturopathic theory and practice are not based on the body of basic knowledge related to health, disease, and health care which has been widely accepted by the scientific community. Moreover, irrespective of its theory, the scope and quality of naturopathic education do not prepare the practitioner to make an adequate diagnosis and provide appropriate treatment."

In a paper entitled "Naturopathy: A Monograph," Kimball C. Atwood, MD, Massachusetts Medical Society for the Massachusetts Special Commission on Complementary and Alternative Medical Practitioners, April, 2001, wrote:

"Licensure offers regulation to protect the public. Regulators must hold health professions to a very high standard, since considerable damage can occur as a result of treatment by incompetent practitioners. To be considered a *health* profession, an occupation must be able to demonstrate an objective, scientific, and ethical basis. Naturopathy fails to meet this standard."

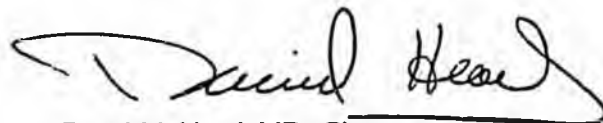
As the regulatory body entrusted with the responsibility for the licensure and discipline of physicians in our state, it is our opinion that the education and training attained by those who practice naturopathy does not prepare them adequately in modern pharmacology nor are they sufficiently trained and skilled to perform surgical procedures. Contrast the four-year education received by the naturopath consisting of two years of didactic training and two years of clinical training against the typically eight to twelve years of education and training received by allopathic and osteopathic physicians.

While some would give the impression that naturopathy is a widely accepted and approved form of health care, only 12 states license naturopaths in this country. The majority of those 12 states do not permit naturopaths to prescribe controlled substances or perform surgeries.

Naturopaths are currently licensed in Alaska. They are regulated but there is no formal, appointed board that provides oversight. With the predominance of remote practice and the lack of on-site supervision or support, it would not serve the Alaskan public well to be in the lead for states to expand the scope of practice for other health care practitioners. In fact, the board believes that the safety of our patients would be at risk.

In the best interests of our patients, we urge you, Governor Murkowski, and our legislators, to defeat these bills.

On behalf of the members of the Alaska State Medical Board, and all physicians in the state, thank you, sir, for your support.



David M. Head, MD, Chair  
Alaska State Medical Board

xc: Members, Alaska State Senate  
Members, Alaska State House of Representatives  
Richard K. Urion, Director, Division of Occupational Licensing  
Alex Malter, MD, President, Alaska State Medical Association

# Alaska State Medical Association

4107 Laurel Street • Anchorage, Alaska 99508 • (907) 562-0304 • (907) 561-2063 (fax)

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Testimony Provided by Alex Malter, MD,  
President, Alaska State Medical Association  
Before the State of Alaska House Judiciary Committee,  
Regarding SB 306 – Practice of Naturopathy

Representative McGuire, Committee Members:

The Alaska State Medical Association (ASMA) represents physicians statewide and primarily works to ensure that Alaskans receive high quality healthcare. ASMA urges the committee to not support SB 306. The legislation would not enhance patient care nor would it improve access to care.

Training for naturopaths is less rigorous than that for medical doctors, in both length and depth of study. Its emphasis on natural healing does not allow students sufficient time to fully learn the in depth pathology, physiology and pharmacology needed to treat most medical conditions. A list compiled by the American Association of Naturopaths (Attachment 1) shows the different treatment modalities studied by naturopaths. Such a broad curriculum cannot allow the time needed to master the appropriate use of prescription drugs.

We are not convinced that the first two years of naturopath and medical schools are the same. But for any courses that actually did cover material in the same detail, medical students might still be expected to master the content better than naturopaths. This is because students are only admitted to medical school if they've excelled in sciences as undergraduates and then passed rigorous entrance exams.

By comparison, we are not aware of similar admission tests for naturopath schools and some don't even require a college degree for enrollment. (While the naturopath doctors have argued this isn't true for programs accredited for Alaskan licensure, the HESS committee heard testimony two days ago of a Bastyr student without a prior college degree enrolled in a ND program.)

But more importantly, medical students spend at least an additional four years in school and residency before licensure. These "clinical years" emphasize the appropriate and safe use of medicines, and are the backbone of physicians' training. Naturopath programs do not require such residencies, and the last two years of their school are more focused on non-pharmacological treatments.

Thus, while physicians are only licensed after completing six years of training, SB 306 would allow naturopaths to prescribe after just four years, none of which primarily emphasize the safe and effective use of prescription drugs. This could be unsafe for patients.

Some have argued that naturopaths are more qualified to prescribe than physician assistants and others with fewer years of training. We respectfully disagree. PA's are only licensed after they've completed clinical internships that immerse them in the appropriate use of prescription drugs. It is not simply the numbers of years of training that qualifies one to prescribe, but rather the content and focus of training.

ASMA also does not believe naturopaths are qualified to perform minor surgery. Suturing lacerations and removing moles can be complex. The decisions involved with selecting optimal closure or biopsy type (and the associated risks) are not mastered after a short course of study. For example, while it may seem simple to biopsy a mole, it is more complex to determine what type of biopsy is best for which lesions, or to assess which lesions could be cancerous and at higher risk of spreading if diagnosed or biopsied incorrectly. As surgeons are quick to point out: there is no such thing as "minor surgery" there are just minor surgeons....

Beyond the question of whether naturopath's scope of practice should be expanded, some reviews even question the safety and efficacy of the field's current treatment methods. A comprehensive 2001 analysis for the Massachusetts Special Commission on Complementary and Alternative Medical Practice found Naturopathy could sometimes be dangerous and concluded: "no amount of regulation is likely to mitigate this fact".<sup>1</sup> Medicare has also expressed reservations about the naturopathy practice (Attachment 2).

While these conclusions may sound alarmist, I personally cared for a young woman who had a tragic outcome when a naturopath treated her three months for "chronic fatigue syndrome" and failed to diagnose her lymphoma while it was still at a treatable stage.

Finally, expanding the scope of practice for the 30 or so naturopaths in Alaska will not likely improve access to care in the state. We are not aware of many naturopaths practicing in those rural areas in which access issues are most critical. And for seniors having problems with access, Medicare does not typically reimburse naturopaths anyway.

In summary, ASMA believes it would be unwise and unsafe for the State of Alaska to effectively endorse the practice of naturopaths by granting them the broad expansion of privileges granted in SB 306.

ASMA recommends that a panel be set up to work on this issue over the interim, comprised of physicians, naturopaths and other interested parties. As President, I give my word that the Association will make every effort to work toward a solution that is safe for patients and satisfactory to doctors and naturopaths. This panel could ideally suggest provisions for a replacement bill for the next session.

Also, we respectfully suggest that in the future, bills like SB 306 dealing with scope of practice issues should be referred to the HESS Committee for review. We believe HESS brings more expertise to these issues, and that its "institutional wisdom" allows the most thoughtful consideration for bills dealing with health related issues.

1. KC Atwood, Naturopathy: A Monograph, For the Massachusetts Special Commission on Complementary and Alternative Medical Practitioners, Mass. Medical Society, April, 2001

## Attachment 1: The Professional Scope of Practice for Naturopaths\*

The professional scope of practice for naturopathic physicians is defined in the AANP guidelines below:

1. The scope of naturopathic physician's practice is eclectic and dynamic in nature.
2. Naturopathic physicians are trained to understand and utilize a wide variety of therapeutic modalities and to select the treatment that, in their opinion, best serves the patient's condition.
3. The types of therapeutics a physician may choose from include, but are not limited to:
  - a. Acupuncture
  - b. Botanical medicine
  - c. Clinical nutrition and nutritional counseling
  - d. Electrohydrotherapy
  - e. Homeopathy
  - f. Light and air therapy
  - g. Massage therapy/neuro-muscular technique
  - h. Natural childbirth
  - i. Naturopathic manipulative technique
  - j. Orthopedics
  - k. Physical medicine
  - l. Psychotherapy and counseling
  - m. Soft tissue manipulation
  - n. Surgery
  - o. Use of appropriate pharmacological agents

\* From: American Association of Naturopathic Physicians. (1998) AANP Definition of Naturopathic Medicine: Adopted November 1989, Rippling River Convention, Seattle, WA. (HJ Hough, PhD, C Dower, JD, EH O'Neil, PhD. *Profile of a Profession: Naturopathic Practice*, Center for the Health Professions University of California, San Francisco. Sept 2001, pp 41-42)

Attachment 2: Conclusion of Medicare's Report on Naturopaths\*

Conclusions:

Naturopathic theory and practice are not based on the body of basic knowledge related to health, disease, and health care which has been widely accepted by the scientific community.

Moreover, irrespective of its theory, the scope and quality of naturopathic education do not prepare the practitioner to make an adequate diagnosis and provide appropriate treatment.

\* Department of Health, Education, and Welfare, *Independent Practitioners under Medicare* – December, 1968



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May 7, 2004

Honorable Lesil McGuire  
Chair, House Judiciary Committee  
Alaska State Legislature  
State Capitol (MS3100)  
Juneau, AK 99801-1182

RE: Concerns relating to SB 306, "An Act relating to the practice of naturopathic medicine"

Dear Chairwoman McGuire;

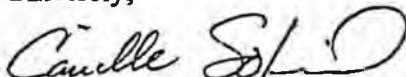
The Alaska Nurses Association is concerned about the current version of SB 306, "An Act relating to the practice of naturopathic medicine." We are concerned that the bill does not thoroughly provide for patient safety and will not support its passage until such protections are put into place.

First, prescriptive power and expansion of scope of practice under an existing license should be limited to licensees who are overseen by a regulatory board. Such Boards should include public members and the appropriate licensed professional to ensure safe practice by oversight and prevent abuse. Although cost will always be a concern, the board should be self supporting, through licensing fees.

Second, we oppose the blanket approval of prescriptive authority being granted over controlled substances, specifically over schedules IIIA and IVA. Proscriptive authority should be limited to the appropriate drugs to which the naturopaths have received extensive training and are in line with the type of medicine that they normally practice. Such limitations will limit patients' exposure to harm, focus the training for initial licensing and continuing competence, and limit potential abuse.

Finally, although AaNA continues to be concerned about the access to medical care for patients in the state, it is imperative that any expansion of the naturopaths' practice be done in a comprehensive way that accounts for patient safety, oversight of the practice, and is appropriate given the accredited standards for training naturopaths. AaNA encourages the House Health, Education and Social Services Committee to delay passage of this bill until all questions are adequately answered. If this bill needs to be revisited next session, we look forward to supporting it once thorough considerations for patient safety and safe expansion of practice have been addressed.

Sincerely,

  
Camille Soleil, JD  
Executive Director

CC: House Judiciary Members



# ALASKA STATE LEGISLATURE

Please enter into the record my testimony to the HOUSE Judiciary Cmte.  
Committee Name  
 Committee on SB269 Dated May 08, 2004  
Bill / Subject

*Please enter this testimony  
 into the record.*

SIGNED:

June Pinnell-Stephens

Testifier

ACLU

Representing

3140 Roden Lane, Fairbanks 99709

Address / Phone Number

My name is June Pinnell-Stephens, and I have been a librarian for more than 30 years. I'm also past-president and a current board member of the Alaska Civil Liberties Union, and I am speaking on their behalf today in opposition to this bill.

At each of the hearings I've attended for this bill, committee members have been told that federal funds under the Family Educational Rights Privacy Act, or FERPA, may be at risk if the bill isn't passed. This allegation is simply not true.

FERPA requires that parents of students have a right to examine the records maintained by educational institutions for their children under age 18. Setting aside the question of whether library circulation records even qualify under FERPA, the current law already allows parents to see circulation information from school libraries.

FERPA, however, does not apply to public libraries for the simple reason that public libraries don't have students. Quoting from the law, "the term 'student' includes any person with respect to whom an educational agency or institution maintains education records or personally identifiable information, **but does not include a person who has not been in attendance at such agency or institution.**" Clearly, nothing in FERPA would cover the records of anyone merely checking books out of a public library. The suggestion that federal funding could be at risk under FERPA because we don't allow access to public library records is absurd.

Another section of FERPA covers students in postsecondary institutions. Again quoting from the law, "Whenever a student has attained eighteen years of age, **or is attending an institution of postsecondary education, the permission or consent required of and the rights accorded to the parents of the student shall thereafter only be required of and accorded to the student.**" We have many students at the university younger than 18. I know one young woman who earned enough credits at UAF to complete her freshman year by the time she had graduated from high school at age 16. Earlier this spring, I gave a guest lecture on campus and asked the class if any of them were under 18 - four of the approximately 30 students raised their hands. I contend that this bill, since it does not provide for this transfer of rights under FERPA for younger students in postsecondary institutions, is likely to endanger, not protect, those federal funds. At the very least, you should resolve this question before passing this bill as it is written.

There are many places in our statutes where we recognize the wishes of minors over the objections of their parents. For example, minors can be married as young as 14 if a judge allows it because the parents are in disagreement among themselves or unfit to decide the matter. (25.05.17) Most of these statutes are in place to protect the minors from abuse by their parents. Having officially recognized that not all parents fit the Ozzie and Harriet mold, why now pass a bill that could place a minor at risk if he or she has checked out a book on abuse, not for a school report, but to help cope with a grim family situation?

Finally, there is an explicit right to privacy in the state constitution, a right that is not limited by age. I was reminded in an earlier hearing that the Legislature has the responsibility to develop laws to implement that right. However, I doubt that the courts would support laws passed under the implementation language if they effectively nullify the right. I urge you to support the rights of young adults who will be assuming their roles as adults in our communities, possibly in your seats, sooner than we can believe.

Thank you.

May 8, 2004

**Alaska State Legislature  
Senate/House Judiciary Committee**

**RE: SB 306**

**Written Testimony to be read into the House Judiciary Committee record**

**FAX: 907-465-6592**

House Judiciary Committee Members:

It is a privilege to advocate for the passage of Senate Bill 306. I am a Licensed Naturopath working for Eastern Aleutian Tribes. I am an Alaska Native originally from Sand Point, in the Shumagin Islands. I've been working for EAT for the past 2 years serving the communities of Sand Point, King Cove, Nelson Lagoon, Cold Bay, False Pass, Akutan, Adak, and Whittier. I also do consulting services with Southcentral Foundation at the Alaska Native Medical Center in the hopes of developing a Naturopathic Program. Doing health promotion and disease prevention is the focus of my work, along with being the Diabetes Coordinator and director for Complementary and Alternative Medicine in our region. I work with Medical Doctors, Physician Assistants, Family Nurse Practitioners, Community Health Aide Practitioners, Behavioral Health, and Community Health Advocates in our Wellness-based Integrative Health Outreach Program.

As stated in SB 306, Naturopathic Physicians undergo a rigorous 4 year doctoral program after finishing 4 years (or more) of Pre-Medicine at accredited universities. We are trained very similarly to Medical Doctors, but have a specialty in Wellness-oriented medicine with a focus in natural therapies. For example, I am a specialist in Oriental Medicine with an extra 4 years of advanced training/fellowships in Chinese Herbal medicine and Acupuncture. I am also a licensed Naturopathic Physician in the State of Oregon, and possess a DEA license for that state.

What SB 306 does for my practice is allow me to practice as I have been trained. Bush Alaska, as you know, has a shortage of Primary Care Practitioners. Naturopaths are trained to be Primary Care Practitioners. Often, I am called to do things that are above my scope of practice – as many communities just have Community Health Aides. I have an Emergency Medicine background, having served as an Advanced EMT for Cold Bay for 5 years. This comes in handy as I travel the Aleutians. Currently, Health Aides are allowed to prescribe more medications than I can – even though my training in Pharmacology is on par with Medical Doctors. Naturopaths are trained to “do no harm” – as the Hippocratic Oath we take. When we employ medicine, whether herbal or otherwise, we hold this out as one of our fundamental doctrines. Of course, sometimes we need to employ more dramatic measures – including minor surgery and the use of

Pharmaceutical drugs. In that case, it is "do the least harm." SB306 will allow us to practice commensurate with our education, and also allow us to work better with other health care practitioners in the management of our patient's medications. My colleagues and I in Alaska employ the latest in Evidence-based, Best-Practice oriented medical approaches. Drug/drug, Drug/herb and Drug/nutrient depletions are researched for each patient – as we strive to avoid iatrogenic, or "doctor-induced" disease. In my case, I employ a PDA with the latest drug information downloaded weekly, as there are changes to drug information all the time. As ND's we are held to the highest standards. We refer when necessary, and work side-by-side our Allopathic partners. EAT has won awards in its Integrated Health Program as a Community Health Center – and is leading the way in Wellness-based medical approaches designed to address Mind, Body, and Spirit. I am honored to work with the health care team in this region. SB 306 will help us to integrate further, and allow me to provide the people of the Aleutian region truly holistic health support. Thank you for allowing me to testify.

Sincerely,



Dr. Gary Ferguson II  
Naturopath

EASTERN ALEUTIAN TRIBES  
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907-383-3151 Sand Point (currently)  
gary.f@gci.net

**Gene Meiergerd RN, LMT**  
Licensed Massage Therapist

**Movement Toward Health**

February 15, 2004

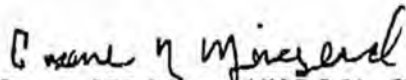
Senator Ralph Seekins  
Representative Jim Holm  
Alaska State Capitol Building  
Juneau, Alaska 99801-1182

ATTN: Senator Seekins  
Representative Holm

I am writing this letter to support the legislative bill an "Act relating to naturopathic physicians". As a practicing RN for over 25 years and a certified therapeutic massage therapist I have had the opportunity to interact with Dr. Dan Young on several occasions. I have found him to be professional, knowledgeable and competent as well as going out of his way to see that patients receive the best possible care.

I support legislation that allows naturopathic physicians to practice in accord with their education, and the full scope of their training. This legislation offers Alaskans freedom of choice in their healthcare, and improved access to effective and safe complementary medical practices. This can only benefit the healthcare community in this great state of Alaska. Please support this bill.

Sincerely,

  
Eugene N Meiergerd RN, MA, CMT

February 18, 2004

To Whom It May Concern:

I am ecstatically happy with the care I have received from Eagle River Naturopathic Medical Center over the past 4 years. Let me give you an overview of my history and why I chose Dr. Daniel Young as my primary care giver.

I am now experiencing the progressive aspect of a disease that only Dr. Young had the insight to diagnose. Due to the inability of Naturopaths to write prescriptions, I am forced to visit an MD so I can receive the prescription medication I am in need of. Were my Naturopath able to write prescriptions, I would have saved over \$500.00 out of pocket, my insurance which is partially paid by the State, would have saved over \$3000.00. I would have more food in my cupboards, and my primary care provider would have an improved understanding of what I am dealing with.

Approximately 5 years ago, I began having "attacks". My heart rate would skyrocket to over 160 beats per minute and my blood pressure would soar. It took me about a year, many doctor visits, a few ER visits with the afor-mentioned symptoms, and a few prescriptions to mask the symptoms, to finally get a clue that the mainstream medical community was oblivious to any problem that would cause these symptoms. They checked my heart; it was beautiful, so I ruled that out. We went through blood tests of every sort (except allergy and thyroid antibody test), and the results stumped them. I knew something was awry. The mainstream medical community, who theoretically had more medical intelligence than I did, was letting me down.

I was fed up with the mainstream medical community and looked into Naturopathy. It was the best decision I ever made. I went to Dr. Young in an almost suicidal state. I felt lost, confused and at the worst health and emotional state I had ever been. After our initial discussion and having blood drawn, I went home with a regimen for self healing.

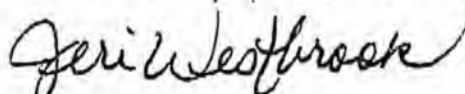
When blood tests results were back, I was diagnosed with Hashimoto's Thyroiditis, allergies and tendencies towards hypoglycemia. Within six weeks, Dr. Young's regimen had me feeling like a healthy human being. For the first time in years, I lost weight, was thinking clearer and the depression I had been experiencing was all but gone. Life was good.

I was in an auto accident in August, 2003, and visited a Chiropractor for 27 adjustments. After an issue with the Chiropractor regarding the adjustments causing more problems, I asked Dr. Young if he, as a Naturopath, would help me with my pain issues. I explained the situation to him and after two visits with Dr. Young, I am doing better than I have since the accident.

The State of Alaska needs to come into the 21<sup>st</sup> Century and recognize Naturopathic Medicine. In allowing Naturopath's to prescribe prescription drugs and do minor surgeries, the state, the insurance companies, the families of patients, and most importantly, the patient and doctor, would benefit.

Again, I would like to point out that if HB 434 and SB 306 are put into effect, it would save myself, and my insurance (which the state pays for) money.

I support HB 434 and SB 306, and ask that you do, too.



Jeri Westbrook  
7362 W. Parks Hwy #323  
Wasilla, AK 99654

5-11-04

To: Representative Lesil McGuire

FAX: 907 465 6592

RE: SB 306 scheduled to be heard in H-JUD today

From: Cathy Giessel, MS, FNP-CS  
cgiessel@mac.com

12701 Ridgewood Road  
Anchorage, AK 99516  
907 345 5470

Representative McGuire,

I have been online for the last 3 days, waiting to deliver this testimony on SB 306 personally. I still wish to do that. However, I may not be able to do so at 10 AM today because of patients I am scheduled to see as a healthcare provider.

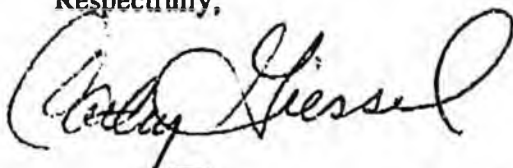
Please accept this written testimony, in case I cannot speak myself.

I have heard that you are considering delegating review and resolution of this issue to a collaborative task force representing the various healthcare professions. I applaud that innovative idea! I believe that it will produce the best result for Alaska.

I have expressed, via lobbyist John Bitney, my interest in seeing an Advanced Nurse Practitioner on that committee. You will see in my testimony that Advanced Nurse Practitioners are already collaborating with Naturopathic Doctors in this state. I believe that our perspective would be valuable to the process.

Thank you for your hard work on finding a reasonable approach to this issue.

Respectfully,



⑤ pages in transmission

HOUSE JUDICIARY  
SB 306  
TESTIMONY

Cathy Glessel

I am an advanced nurse practitioner providing healthcare in Anchorage, born and raised in Fairbanks.

I am testifying as an individual though I have involvement in:

Alaska Board of Nursing, Advanced Nurse Practitioner member and Board Secretary  
Alaska Nurse Practitioner Association, Legislative Affairs Liaison and Public Relations Chair  
American Academy of Nurse Practitioners, State Representative  
Anchorage Health and Human Services Commission

I am testifying to encourage a NO vote on SB 306 in order to allow more time for a deliberate process of review and refinement. In its present form it does not represent the best practice of medicine for the Alaska public.

My concerns about this bill have been expressed since this bill was introduced 3 short months ago. I have communicated my concerns to the bill sponsors as well as the various committees who have heard it. I testified before the H-HESS committee on May 6 on the companion, HB 434, and have been on the phone waiting to testify before H-JUD for the last 3 days.

I also want you to know that I have worked with naturopaths and have great respect for their knowledge of botanicals and the use of herbs in treating some illnesses and promoting wellness.

However, I have some concerns:

1. Public safety

Naturopaths are not trained in conventional medicine and the use of conventional pharmaceutical agents.

There has been much discussion about their basic training compared to a medical doctor. This is really of secondary importance to me. As all of you realize, the basic training in whatever profession you pursue only gives you...basic training. It was after you begin to apply the basic knowledge in daily practice of your chosen profession that you develop expertise.

It is one thing to take a course in pharmacology. It is quite another to apply the information from that course in daily practice. This is the difference between medical and naturopathic education and experience.

What are prescription drugs?

Legend drugs - antibiotics, drugs for high blood pressure, diabetes, migraines and most medications in general; prescription can be written to be refilled for one year.

You have probably received an antibiotic. I have people walk into my office and ask for certain antibiotic – but it is not that simple.

Steps:

1. First I have to determine if an antibiotic is appropriate.
2. Then –what bacteria am I treating, which will determine what type of antibiotic to prescribe?
3. What resistance patterns exist that would preclude using certain medications?
4. What is the patient's history of antibiotic use and how will this impact which medication I prescribe?
5. What best practice guidelines, if any, have demonstrated by research to be the most effective?
6. Finally – does the patient have any drug allergies... and how do I safely prescribe around that allergy?

These questions are decided on a case by case consideration; it is not a "cookbook" process. The decision making requires up-to-date knowledge and experience. The skills are not gained in a course taken during basic training one year, 5 years, 25 years ago.

Each year I spend several thousand dollars and countless hours maintaining my prescribing expertise. This is not because I am a nurse practitioner. It is because this level of dedication is necessary to safely and effectively prescribe – any MD does the same. Medicine is a dynamic science, changing on an almost daily basis.

Prescribing is a serious responsibility. It is not a casual process but one that requires constant attention and ongoing education. This is difficult to do if a person's focus is on another philosophy of healthcare such as naturopathy.

Then there are the controlled substances. The Federal Drug Enforcement Administration oversees this level of prescribing

**Controlled substances have abuse potential and are ranked:**

**Schedule I** - very restricted use; research only - example: cocaine, TCP, heroin, ecstasy, LSD, marijuana

**Schedule II** - high potential for abuse which may lead to severe psychological or physical dependence; prescriptions cannot have any refills, must be rewritten each time prescribed. Examples: morphine, Demerol, oxycodone, cocaine precursors, duragesic, Ritalin, raw opium.

**Schedule III** - moderate to low physical dependence or high psychological dependence, prescriptions will be in effect only 6 months and will need to be rewritten every 6 months. Examples: hydrocodone, fiorinal, testosterone and other anabolic steroids, vicodin.

**Schedule IV** - low abuse potential but may lead to limited physical or psychological dependence, prescriptions will be in effect only 6 months and will need to be rewritten every 6 months. Examples: Darvon, darvocet, midrin, Librium, xanax, Valium, sonata, ambien

**Schedule V - low abuse potential and may or may not require a prescription. Examples: robitussin with codeine, kaolin pectin, lomotil.**

Controlled substances carry a yet higher level of responsibility in prescribing – appropriateness, duration, amount prescribed – all-important considerations with these more dangerous medications. In addition, the prescriber must become adept at identifying drug seeking behavior and how to handle those types of situations.

So how do other states handle prescriptive authority of controlled substances for Naturopathic Doctors? A visit to the DEA website – Naturopathic Doctors are listed under “midlevel” providers and shows that:

Only 4 states authorize Naturopathic Doctors to prescribe controlled substances. Three states allow only the non-narcotic drugs from these schedules or testosterone only. AZ is only state that authorizes schedules 2-5 for Naturopathic Doctors and tAZ has a naturopathic regulatory oversight board. What statutes and regulations are in place in AZ? I don't know. But you are about to make a decision on this and you should know the answer to this question to wisely make this change in naturopathic scope of practice.

I have worked with NDs and that they are very knowledgeable about botanicals and herbs and their use in healthcare. But there is a very significant difference between knowledge of natural substances in healing and use of prescription medications. This does not mean that NDs are uneducated or badly prepared or bad people. It simply recognizes that they have specialized in a very different approach to healing and this difference is not casually bridged by a legislative action such as SB 306.

2. The regulatory oversight provided in SB 306 is very superficial.

The peer review committee is made up of three naturopaths who are overseeing their fellow naturopaths. None of them have conventional training to prepare them to oversee this serious expansion of scope. An appropriate regulatory board would include members from the conventional medical profession and pharmacists, as well as consumers.

The bill provides for the prescription or administration of intravenous "substances" (08.45.120(2)). What are these substances? I could find no definition. If you don't know either, you probably don't want to authorize its administration into someone's vein.

3 **THIS IS NOT URGENTLY NEEDED LEGISLATION:**

I recommend a more deliberate review of the legislation with a collaborative effort by the professionals concerned. There is time to do this. Here's why:

There are only 29 ND listed on the Division of Occupational Licensing website with Alaska addresses.

25 of the Naturopathic Doctors have addresses in Anchorage, Fairbanks, and Juneau – that is 86% of Naturopathic Doctors located in Alaska cities where conventional

healthcare is readily available for referral.

In addition – and this is very important – many Naturopathic Doctors have an Advanced Nurse Practitioner practicing in their clinics with them. A few Advanced Nurse Practitioners are partners or co-owners in clinics with the Naturopathic Doctor. This means that many Naturopathic Doctor patients already have easy access to conventional care right in those clinics. There is no inconvenience to the patient; there is no barrier to appropriate healthcare delivery.

This legislation is not an urgent necessity.

**CONCLUSION:**

Many of you on this committee did not know anything about naturopathy 3 months ago. You may not know as much as you need to know right now.

Naturopathic Doctors are a knowledgeable and caring group of providers who are expert in their field of using natural substances. But both House HESS and Judiciary have heard examples from NDs of cases that they felt they were treating appropriately, that Dr. Malter pointed out were not in line with conventional medicine's treatment standards. It usually works out best for everyone, primarily the public, if we all stick to doing what we do best.

This is a bad time to be making a hasty decision on such serious healthcare legislation. I suggest that there is more information that you need to review to make a sound, wise decision on this matter. You have been entrusted to be the gatekeepers. This is a huge responsibility. I would urge you to give yourself the time and information you need by not passing this bill today, but instead delegating the issue to further consideration and review.

THANK YOU for your hard work for Alaska in the Legislature.

Cathy Giessel, MS, FNP-CS  
cgiessel@mac.com

12701 Ridgewood Road  
Anchorage, AK 99516  
907 345 5470



# ALASKA STATE SENATE

Session:  
State Capitol  
Juneau, Alaska 99801-1182  
(907) 465-2327  
(907) 465-5241 Fax



Interim:  
119 N. Cushman, Suite 201  
Fairbanks, Alaska 99701  
(907) 456-8161  
Senator\_Ralph\_Seekins@legis.state.ak.us

**Senator Ralph Seekins**  
District D

## MEMORANDUM

Date: May 7, 2004

To: Office of Representative McGuire

From: Senator Ralph Seekins

Re: Request for Hearing of SB 306

A handwritten signature in black ink, appearing to read "A. C. R. S.", located to the right of the "To:" field.

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Attached please find Senate Bill 306 along with a concomitant sponsor statement and other related information.

Senate Bill 306 updates statutes pertaining to the practice of naturopathic medicine.

I respectfully request this bill be scheduled on the Senate floor at your earliest convenience.  
Thank you.

# ALASKA STATE SENATE



Session:  
State Capitol  
Juneau, Alaska 99801-1182  
(907) 465-2327  
(907) 465-5241 Fax

Interim:  
119 N. Cushman, Suite 201  
Fairbanks, Alaska 99701  
(907) 456-8161  
Senator\_Ralph\_Seekins@legis.state.ak.us

Senator Ralph Seekins  
District D

## Senate Bill 306 Sponsor Statement

**“An Act relating to the practice of naturopathic medicine.”**

The proposed legislation serves to update 17-year old statutes pertaining to the practice of naturopathic medicine. In so doing, Alaskans accessibility to safe, comprehensive, high-quality health care services will be significantly enhanced.

Key elements of this legislation are as follows:

1. Safeguards Alaskans use of naturopathic medicine by ensuring the highest quality care possible is provided by licensed, well trained, and professionally examined naturopathic physicians. These physicians have undergone rigorous course study provided through federally approved naturopathic medical schools.
2. Adds new continuing education requirements whereby practitioners are subject to a state and national examination process. Furthermore, a peer review process will be implemented to provide oversight and complaint resolution through the Division of Occupational Licensing.
3. Establishes a scope of practice to include the performance of minor surgery in accordance with requisite education and training.
4. Authorizes prescriptive rights for legend drugs and controlled substances allowed under DEA Schedule III, IV and V conditioned upon: DEA licensure; pharmacology training, and; execution of a collaborative agreement with a licensed MD overseeing the protocols and practices under which these drugs can be prescribed.
5. Establishes a qualified trade association of naturopathic physicians to work with the Division of Occupational Licensing towards the implementation of regulations requiring specific state and federal examinations and licensure requirements. The association will be self-funded.

Like allopathic (aka medical) physicians, naturopathic physicians undergo four years of undergraduate pre-professional training followed by an intensive 4 year doctoral program emphasizing both academic and clinical studies within the scope of primary care.

It is important that our state laws reflect the high level education that naturopathic physicians receive while also providing some sideboards with respect to the methods and means by which this type of health care is provided.

The practice of naturopathic medicine was first licensed in Alaska 17 years ago. It is now time to revisit these statutes and apply a fresh coat of paint where needed. The proposed legislation neatly accomplishes this necessary purpose.

# FISCAL NOTE

STATE OF ALASKA  
2004 LEGISLATIVE SESSION

Fiscal Note Number: 1  
Bill Version: SB 306  
(S) Publish Date: 2/27/04

Revision Date/Time (Note if correction): \_\_\_\_\_ Dept. Affected: DCED  
Title Naturopathic Medicine RDU Occupational Licensing (117)  
Component Occupational Licensing  
Sponsor Senators Seekins, Dyson, Green  
Requester Senate Labor & Commerce Component No. 2360

**Expenditures/Revenues** (Thousands of Dollars)

Note: Amounts do not include inflation unless otherwise noted below.

OPERATING EXPENDITURES	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
Personal Services						
Travel						
Contractual						
Supplies						
Equipment						
Land & Structures						
Grants & Claims						
Miscellaneous						
<b>TOTAL OPERATING</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

<b>CAPITAL EXPENDITURES</b>						
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<b>CHANGE IN REVENUES ( )</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
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**FUND SOURCE** (Thousands of Dollars)

1002 Federal Receipts						
1003 GF Match						
1004 GF						
1005 GF/Program Receipts						
1037 GF/Mental Health						
Other (Specify Type--Do not abbreviate)						
<b>TOTAL</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Estimate of any current year (FY2004) cost: 0.0

Mark this box (X) if funding for this bill is included in the Governor's FY 2005 budget proposal:

**POSITIONS**

Full-time						
Part-time						
Temporary						

**ANALYSIS:** (Attach a separate page if necessary)

SB 306 makes amendments to the Naturopathic licensing statutes. No new funds are required to implement the changes in this bill.

Prepared by: Jennifer Strickler, Administrative Manager Phone (907) 465-2144  
Division Occupational Licensing Date/Time 2/12/04 4:05 PM  
Approved by: Edgar Blatchford, Commissioner Date 2/12/2004  
Agency Department of Community & Economic Development

# FISCAL NOTE

STATE OF ALASKA  
2004 LEGISLATIVE SESSION

Fiscal Note Number: 2  
Bill Version: CSSB 306(FIN)  
(S) Publish Date: 5/1/04

Revision Date/Time (Note if correction): \_\_\_\_\_ Dept. Affected: DCED  
Title Naturopathic Medicine RDU Occupational Licensing (117)  
Component Occupational Licensing  
Sponsor Senators Seekins, Dyson, Green  
Requester Senate Finance Component No. 2360

**Expenditures/Revenues (Thousands of Dollars)**

Note: Amounts do not include inflation unless otherwise noted below.

OPERATING EXPENDITURES	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010
Personal Services						
Travel						
Contractual						
Supplies						
Equipment						
Land & Structures						
Grants & Claims						
Miscellaneous						
<b>TOTAL OPERATING</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

<b>CAPITAL EXPENDITURES</b>						
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<b>CHANGE IN REVENUES ( )</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
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**FUND SOURCE (Thousands of Dollars)**

1002 Federal Receipts						
1003 GF Match						
1004 GF						
1005 GF/Program Receipts						
1037 GF/Mental Health						
Other (Specify Type--Do not abbreviate)						
<b>TOTAL</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Estimate of any current year (FY2004) cost: 0.0

Mark this box (X) if funding for this bill is included in the Governor's FY 2005 budget proposal:

**POSITIONS**

Full-time						
Part-time						
Temporary						

**ANALYSIS:** (Attach a separate page if necessary)

CSSB 306(FIN) makes amendments to the Naturopathic licensing statutes. Section 9 provides for the creation of an annual naturopathic peer review committee on which committee members serve without compensation for their work. Therefore, no new funds are required to implement the changes in this bill.

Prepared by: Jennifer Strickler, Administrative Manager Phone (907) 465-2144  
Division Occupational Licensing Date/Time 4/28/04 2:55 PM  
Approved by: Edgar Blatchford, Commissioner Date 4/28/2004  
Agency Department of Community and Economic Development

# LEGAL SERVICES

DIVISION OF LEGAL AND RESEARCH SERVICES  
LEGISLATIVE AFFAIRS AGENCY  
STATE OF ALASKA

(907) 465-3867 or 465-2450  
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State Capitol  
Juneau, Alaska 99801-1182  
Deliveries to: 129 6th St., Rm. 329

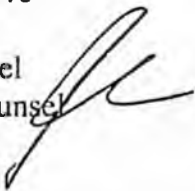
## MEMORANDUM

April 30, 2004

**SUBJECT:** Naturopaths (CSSB 306(FIN))  
(Work Order No. 23-LS1572\U)

**TO:** Senator Ralph Seekins  
Attn: Brian Hove

**FROM:** Jean M. Mischel  
Legislative Counsel



You have requested a sectional summary of the above-described bill.

As a preliminary matter, note that a sectional summary of a bill should not be considered an authoritative interpretation of the bill and the bill itself is the best statement of its contents.

**Section 1.** Changes the term "naturopathy" to "naturopathic medicine." This name change is carried throughout the bill and specifically necessitated sections 3, 11, and 13.

**Section 2.** Changes name as in sec. 1 and allows use of certain titles for licensed naturopaths, including "doctor of naturopathy", "naturopath," and "naturopathic physician."

**Section 3.** See sec. 1.

**Section 4.** Rewrites application procedure and qualifications for naturopath. Removes a reciprocity provision previously applicable to naturopaths licensed in other states before 1987.

**Section 5.** Modifies restrictions on practice of naturopathic medicine. Allows for performing of minor surgery. Required licensee to have appropriate education or training.

**Section 6.** Adds the authority to deny a person a naturopathic medicine license on disciplinary grounds and clarifies certain grounds for denial and disciplinary action.

**Section 7.** Removes a reference to a section repealed by this bill and adds a reference to a new section for purposes of issuing sanctions against a licensee.

**Section 8.** Adds unlicensed use of titles listed in sec. 2 of the bill to misdemeanor provisions.

**Section 9.** Adds a new section requiring the department to adopt regulations pertaining to education, training, continuing education, and certificates for specialty practice. The department is required to consider regulations prepared by the division in collaboration with a trade association. Adds a new section requiring the division to establish a peer review committee for reviewing complaints and make recommendations involving naturopaths.

**Section 10.** Adds new sections pertaining to continuing education standards, authorized activities, and fees. Authorizes licensees to prescribe prescription drugs and certain controlled substances if authorized under department regulations, consistent with the terms of a collaborative agreement with a qualified medical doctor, and if registered with the Federal Drug Enforcement Administration (for controlled substances). Establishes requirements for collaborative agreements.

**Section 11.** See sec. 1.

**Section 12.** Adds definitions of "approved naturopathic college or program," "department," and "minor surgery".

**Section 13.** See sec. 1.

**Section 14.** Repeals AS 08.45.035, pertaining to temporary licenses and 08.45.040, pertaining to required disclosures to a patient.

**Section 15.** Provides a July 1, 2009 "sunset" of collaborative agreement provisions in sec. 9 of the bill.

**Section 16.** Specifies that changes to licensing sections in this bill do not apply to persons licensed prior to February 28, 2005, except that disciplinary provisions apply.

**Section 17.** Provides a delayed effective date of January 1, 2007 for sec. 10.

**Section 18.** Provides an effective date of March 1, 2005, except as provided in sec. 17.



Alaska Association of Naturopathic Physicians, Inc.

*Dedicated to the preservation of quality naturopathic medicine for all Alaskans.*

## **JAMA, 1998**

*The Journal of American Medical Association*

“Naturopaths, like allopathic physicians, receive 4 years of post-baccalaureate education culminating in a doctoral degree. They are broadly trained in the pre-clinical sciences and the clinical disciplines, with an emphasis on health promotion, disease prevention, and treatment based on the stimulation or support of natural process. Their clinical education, which is entirely outpatient based, is designed to prepare them to be primary care providers.

## **Oregon Office of Educational Policy and Planning, 1998**

“Naturopathic medical college prepares N.D.s with a biological and biomedical education of the same breadth and depth that prepares M.D.s to be primary care physicians.”

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## Summary of Naturopathic Medical Legislation

Naturopathic physicians have been licensed to practice in the State of Alaska since 1986. They are currently regulated by the Division of Occupational Licensing under state statute AS 08.45.

This legislation adds the following revisions, in statute, for the practice of naturopathic medicine in the State of Alaska:

- 1) The Division of Occupational Licensing, in collaboration with a qualified trade association, The Alaska Association of Naturopathic Physicians, Inc., shall update current regulations defining naturopathic medical practice in Alaska, to be commensurate with current standards of naturopathic medical education and training.

***The current law is 17 years old and needs to be updated to allow naturopathic physicians to practice commensurate with their federally regulated education.***

- 2) A graduate of a CNME<sup>1</sup> approved naturopathic medical college who has passed the federal Naturopathic Physicians Licensing Examination, (NPLEX) and has been approved by the Division of Occupational Licensing may use the title "Naturopathic Physician".

***Current law is limited to the licensure of "naturopathy" and strictly prohibits the use of the title "Naturopathic Physician".***

<sup>1</sup>The Council of Naturopathic Medical Education (CNME) is the agency recognized by the U.S. Department of Education to serve as the accrediting agency for naturopathic medical programs.

- 3) Implement a requirement for at least 45 hours of continuing education in naturopathic medicine per year, of which 15 hours of instruction is in pharmacology or pharmacotherapeutics, and is presented by a licensed pharmacist (R.Ph.) or Pharm.D., or other professional as approved by the Division of Occupational Licensing and The Alaska Association of Naturopathic Physicians.

***Current law does not include continuing education requirements.***

- 4) Allow a naturopathic physician who has graduated from a CNME<sup>1</sup> approved naturopathic medical college, and has passed the pharmacology exam as administered by the federal Naturopathic Physicians Licensing Examination, (NPLEX), and is licensed by the State of Alaska to:

- a) Prescribe or administer legend or prescription substances and to

- b) Prescribe a controlled substance after becoming registered with the federal Drug Enforcement Administration (DEA)

***Current law does not authorize any prescriptive rights whatsoever, or allow for DEA registration as is required in 14 other states.***

- 5) Allow a naturopathic physician who has graduated from a CNME<sup>1</sup> approved naturopathic medical college, and has passed the minor surgery exam, as administered by the federal Naturopathic Physicians Licensing Examination, (NPLEX), and is licensed by the State of Alaska to perform minor surgery as defined in Section 13 (c) of this HB 434 and SB 306.

***Current law does not allow a naturopathic physician to perform minor surgery in the State of Alaska, whereas 14 other states do.***

Appendix C:  
A Comparison of Licensed Medical Professions in The State of Alaska



Licensed Practical Nurse	9 months to 2 year practical nursing program, the 1 year program being the most common
Registered Nurse	One of the following: <ul style="list-style-type: none"> <li>• A 2-yr. Associate's degree, or</li> <li>• A 3-yr. Diploma program, (hospital based), or</li> <li>• A 4-yr. Bachelor's degree in nursing, or</li> <li>• A 4-yr. Bachelor's degree in another discipline and a 3-yr. Master's degree in nursing, or</li> <li>• A 4-yr. Bachelor's degree in another discipline and a 4-yr. Nursing Doctorate program</li> </ul>
Advanced Registered Nurse Practitioner	In addition to holding a license as a Registered Nurse, an A.R.N.P. completes one of the following: <ul style="list-style-type: none"> <li>• A 9 month to 2 year certificate program in specialty, or</li> <li>• A 2 year Master's degree certified in specialty</li> </ul>
Physician's Assistant (PA)	4-yr. Bachelor's degree and 18 to 24 months master's degree (must work under the supervision of a physician)
Allopathic Physician (MD)	4-yr. Bachelor's degree in pre-medical and 2 to 5 years of post-graduate training in allopathic medical school; internship, residency
Naturopathic Physician (ND)	4-yr Bachelor's degree with pre-medical/science emphasis and 4 to 5 years post-graduate training in naturopathic medical school; externship required for graduation, residency options becoming more available

Appendix D:  
Comparison of Naturopathic Governance In Licensed States



State	Scope of Practice	Board Membership	Date of Inception
Alaska	No obstetrics No minor surgery No prescription rights No right to lab tests or diagnostic tests	No professional board Under supervision of Occupational Licensing Board No Naturopathic Members	At 1987
Arizona	Full prescription rights except schedule 1 prescription	3 naturopathic physicians 2 public members	Before 1940
California	Full practice rights All natural & synthetic hormones; epi for anaphylaxis Prescription under MD, DO (under 2 year study)	Zero cost bureau under DCA 3 Naturopathic Physicians 3 Medical Physicians 3 Public Members	January 1, 2004  Note: original law sunset
Connecticut	Full practice rights No prescription rights	2 naturopathic physicians 1 public member	Before 1949
Hawaii	Full practice rights Drug formulary	3 naturopathic physicians 2 public members	Before 1937
Maine	Full practice rights Drug formulary	Alternative medicine board combining acupuncturists and naturopathic physicians 2 naturopathic doctors 2 acupuncturists 1 allopathic physician (MD or DO) 1 pharmacist 1 public member	At 1996
Montana	Full practice rights Drug formulary	Complimentary Medical Board combining naturopathic physicians and midwives 2 naturopathic physicians 2 midwives 2 public members 1 MD obstetrician	At 1991
New Hampshire	Full practice rights Drug formulary	4 naturopathic physicians 1 public member	Before 1990
Oregon	Full practice rights Drug formulary	4 naturopathic physicians 1 public member	Before 1940
Utah	Full practice rights Drug formulary	3 naturopathic physicians 2 public members	At 1997
Vermont	Full practice rights Drug formulary	2 naturopathic physicians 1 administrator	At 1996
Washington	Full practice rights Drug formulary No cancer treatment	3 naturopathic physicians 2 public members	Before 1950

Appendix E:  
Comparison of Naturopathic And Major Medical Schools



	National	Bastyr	Southwest	John Hopkins	Yale	Stanford
<b>Basic and Clinical Sciences</b> Anatomy, Cell Biology, Physiology, Pathology, Neuroscience, Clinical / Physical Diagnosis, Histology, Genetics Biochemistry, Pharmacology, Lab Diagnosis, Pharmacognosy, Public Health, History, Philosophy, Ethics, Research and other coursework.	1548	1639	1419	1771	1420	1383
<b>Clerkships (1) and Allopathic Therapeutics</b> Lecture and Clinical Instruction in Dermatology, Family Medicine, Psychiatry, Internal Medicine, Radiology, Pediatrics, Obstetrics, Gynecology, Neurology, Surgery (2), Ophthalmology, and Clinical Electives.	2244	1925	1920	3391	2891	3897
<b>Advanced Naturopathic Therapeutics</b>	—	44	20	—	—	—
<b>Ayurvedic Medicine</b>	—	22	20	—	—	—
<b>Botanical Medicine</b>	96	110	120	—	—	—
<b>Counseling (4)</b>	144	143	100	—	—	—
<b>Homeopathy</b>	144	88	140	—	—	—
<b>Hydrotherapy</b>	48	39	40	—	—	—
<b>Naturopathic Case Analysis / Management (5)</b>	—	66	120	—	—	—
<b>Naturopathic Manipulative Therapy</b>	156	176	180	—	—	—
<b>Naturopathic Medicine</b>						
<b>Naturopathic Philosophy</b>	72	55	60	—	—	—
<b>Oriental Medicine</b>	72	33	200	—	—	—
<b>Therapeutic Nutrition (3)</b>	144	132	130	—	—	—
<b>Subtotals:</b>	876	908	1130	0	0	0
<b>Total Reported Hours:</b>	4668	4472	4459	5162	4311 (+ thesis)	5280

1. Clerkships are estimated to be 40 hours of mixed lecture and clinical training.
2. Naturopathic Physicians study minor surgery only.
3. No dedicated coursework in therapeutic nutrition appears in the college catalogs of Hopkins, Yale or Stanford, although they indicate that the subject is addressed in other courses.
4. Totals for John Hopkins, Yale and Stanford are included in psychiatry coursework.
5. Hours which could also be allocated to this category may be included elsewhere for some institutions because of terminology differences in the course

Sources: 1996-97 *Curriculum Directory* of the American Association of American Medical Colleges  
1995-97 catalog of National College of Naturopathic Medicine  
1996-98 catalog of Bastyr University  
1996-97 catalog of Southwestern College of Naturopathic Medicine and Health Sciences

## Comparison of Pharmacology Training

Just as biochemistry is biochemistry, pharmacology is pharmacology. Pharmacology, like biochemistry, is a basic science -- usually taught in the first two years of medical school. Pharmacology training for naturopathic doctors is fundamentally the same as the training other primary care doctors receive.



Table 1 compares the total hours required of three medical disciplines in the basic sciences, including pharmacology.

Table 2 compares the total hours of clinical clerkships and therapeutics required by six different medical colleges, three naturopathic medical schools and three allopathic medical schools.

In the 13 states where naturopathic physicians have prescription rights

- ⇒ Naturopathic physicians must graduate from a CNME-approved naturopathic medical college
- ⇒ Pass the pharmacology exam as administered by NPLEX (Naturopathic Physicians Licensing Examination)
- ⇒ Be licensed by the state where they practice
- ⇒ Obtain a DEA registration number.
- ⇒ Remain current with continuing education required by the state

With these stringent requirements met, NDs in these states safely prescribe or administer prescription or controlled substances WHEN THEY NEED TO.

To further assure public safety in Alaska, our legislation requires a mandatory, 60-hour course taught by pharmacists (R.Ph.) and by Pharm.D.s (pharmacists who are also MDs) which focuses on pharmacotherapeutics (the therapeutic use of drugs). This will ensure that naturopathic doctors who graduated long ago will have their knowledge brought up to current provisions.

**Table 1. Comparison of Average Number of Hours in Basic Science Instruction**

	Allopathic <sup>1</sup>	Osteopathic <sup>2</sup>	Naturopathic <sup>3</sup>
Anatomy (gross and micro)	380	362	350
Physiology	125	126	250
Biochemistry	109	103	125
Pharmacology	114	108	100
Pathology	166	152	125
Microbiology/Immunology	185	125	175

Sources:

<sup>1</sup>Ref. Association of American Medical Colleges Curriculum Directory, 1996-1997.

<sup>2</sup>Ref. 1996 Statistical Report. Chevy Chase, MD: American Association of Colleges of Osteopathic Medicine.

<sup>3</sup>Ref. State of Oregon. Oregon Administrative Rules, Oregon Board of Naturopathic Examiners, Chapter 850. Salem, OR.

Note: Allopathic (MD); Osteopathic (DO); Naturopathic (ND)

Used with Permission; *Common Paths in Medical Education*, Clyde B. Jensen, Ph.D., Alternative and Complementary Therapies; August 1997

**Table 2: Comparison of major naturopathic and allopathic medical school clinical training**

Clerkships and Clinical Therapeutics	National	Bastyr	Southwest	John Hopkins	Yale	Stanford
Total Hours	3120	2833	3050	3391	2891	3897

Sources:

American Association of American Medical Colleges, Curriculum directory (1996-1997)

National College of Naturopathic Medicine catalogs (1995-1997)

Bastyr University of Naturopathic Medicine and Health Sciences catalogs (1996-98)

Southwest College of Naturopathic Medicine and Health Sciences catalogs (1996 - 1998)

Assuring Safe Naturopathic Medical Practices for Alaskans  
Pharmacology Education Comparison:  
Stanford to NCNM



Alaska Association of Naturopathic Physicians, Inc.

**NCNM**

National College of Naturopathic Medicine

**CLS 516 Pharmacology I.** (3 credit hours lecture) Prerequisites: BAS 425/432. (3 credit hours lecture). This course presents the principles of pharmacodynamics, including drug absorption, metabolism, distribution, excretion, and mechanism of action. Students are expected to classify and describe the pharmacodynamics, side effects, and therapeutic uses of drug prototypes from the contemporary drug classes. Special emphasis is given to drugs contained in the Oregon and other naturopathic formularies. Prerequisites: BAS 425/432. (National College of Naturopathic Medicine Course Catalog, pp. 61- 62)

Topics for Fall 2003

**General Principles:** pharmacokinetics, pharmacodynamics; **Autonomic Nervous System:** sympathomimetics, sympatholytics, parasympathomimetics, parasympatholytics muscle relaxants; **Central Nervous System:** anxiolytics and hypnotics antipsychotics, agents for affective disorders, anti-epileptic drugs, agents for neurodegenerative disorders, analgesic drugs, drugs of abuse, local anesthetics; **Respiratory Agents;** **Diuretics.** (National College of Naturopathic Medicine Course Information Form, T. Ann Blair, Ph.D., [blaira@ohsu.edu](mailto:blaira@ohsu.edu))

**CLS 526 Pharmacology II.** (3 credit hours lecture). This course presents the principles of pharmacodynamics, including drug absorption, metabolism, distribution, excretion, and mechanism of action. Students are expected to classify and describe the pharmacodynamics, side effects, and therapeutic uses of drug prototypes from the contemporary drug classes. Special emphasis is given to drugs contained in the Oregon and other naturopathic formularies. Prerequisites: BAS 425/432.

Topics for Winter 2004

**Cardiovascular:** antihypertensive, anti-anginal, antilipemic agents, congestive heart failure, anti-arrhythmic agents, blood formation, hemostasis, thrombosis, gastrointestinal agents; **Endocrine:** thyroid hormones, male and female reproductive hormones, glycemic agents, adrenal steroids, vitamin D and A agents, autacid drugs, nsoids, dmards; **Chemotherapy:** antimicrobial, antiviral, antifungal, antiparasitic, cancer chemotherapy, anti-obesity agents, otc's, drug interactions. (National College of Naturopathic Medicine Course Information Form, T. Ann Blair, Ph.D., [blaira@ohsu.edu](mailto:blaira@ohsu.edu))

**BOT 520/530/610 Botanical Materia Medica I, II, III** (3 credit hours lecture winter, 2 credit hours lecture spring, 3 credit hours lecture fall) These sequential courses comprise a detailed survey of plants and plant preparations used in naturopathic practice, integrating traditional herbal knowledge with modern pharmacological research. The pharmacognosy, pharmacodynamics, toxicology, and therapeutics of each plant are considered. The coursework begins with an intensive on medicinal plant chemistry and follows with a focus on organ systems—the pathologies, the herbal treatments, and practical case presentation and workshops on case management and prescribing herbal formulas. Prerequisites: concurrent enrollment in CLS 520/530

**Elective: CLS 640E Natural Pharmacology** (2 credit hours lecture) This course offers an in-depth look at evidence-based therapeutic interventions, ranging from diet and nutrition to botanical therapies. Students will be exposed to the latest scientific evidence in the field of natural medicine and will learn how to adjust individual patient biochemistry in order to regain and sustain optimal wellness through maintenance of a physiologically balanced homeostasis. Prerequisites: third-year status.

(<http://www.ncnm.edu/b3pdfs/ncnm%20cat.pdt>)

Assuring Safe Naturopathic Medical Practices for Alaskans  
Pharmacology Education Comparison:  
Stanford to NCNM



Alaska Association of Naturopathic Physicians, Inc.



Stanford University

**SCHOOL OF MEDICINE CATALOG**

**BOOK ONE**

**MPha 201. Pharmacology.** Covers the principles of pharmacology and the major drug groups used in medicine. Major drug topics will include drug-receptor interaction, kinetic aspects of drug absorption, distribution and elimination, and drug metabolism. Major drug groups considered in this course include those affecting the Central Nervous System, the Autonomic Nervous System, and the Cardiovascular System. Peripherally acting drugs discussed include cholinergic/anticholinergics, adrenergics/antiadrenergics, antiarrhythmics, and vasodilators. Centrally acting drugs discussed include anticonvulsants, anesthetics, sedatives, analgesics, tranquilizers, and other psychoactive drugs. Problems of drug abuse are also considered. The emphasis of the course is on the mechanisms of action of drugs in man. A final exam will be given. Prerequisites: Mammalian physiology and biochemistry. Introductory neurobiology is recommended. 5 units. (J. Ferrell, staff - Department of Molecular Pharmacology)

**MPha 202. Pharmacology.** A continuation of Pharmacology 201. Major drug groups considered in this course include: chemotherapeutic agents, antibiotics; antiparasitic drugs; anticancer agents; thrombolytic agents; anti-inflammatory agents, and drugs regulating endocrine function. This course also includes discussion of toxicology. A final exam will be given. Prerequisites: Mammalian physiology, biochemistry and microbiology. Students who have not taken Pharmacology 201 (or equivalent) should consult the instructor. 5 units. (R. Roth, staff - Department of Molecular Pharmacology)

[http://med.stanford.edu/school/catalog/bookone/coursegrid\\_descriptions.html](http://med.stanford.edu/school/catalog/bookone/coursegrid_descriptions.html)



Alaska Association of Naturopathic Physicians, Inc.

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## Definitions

### ***Controlled Substances***

A substance subject to the Controlled Substances Act (1970), which regulates the prescribing and dispensing, as well as the manufacturing, storage, sale, or distribution of substance's assigned to five schedules according to their 1) potential for or evidence of abuse, 2) potential for psychic or physiologic dependence, 3) contributing a public health risk, 4) harmful pharmacologic effect, or 5) role as a precursor of other controlled substances

*Note: Controlled Substances in Schedules II -V have an accepted medical use in the United States, and Schedule 1 substances do not.*

### ***DEA Registration***

The Drug Enforcement Administration (DEA) is the primary agency within the Federal Government responsible for the enforcement of the Controlled Substances Act (CSA) of 1971

A prescription order for a controlled substance may be issued only by a physician, dentist, podiatrist, veterinarian, mid-level practitioner or other registered practitioner who is:

1. Authorized to prescribe controlled substances by the jurisdiction in which he/she is licensed to practice;
- and
2. Registered with DEA or exempted from registration (i.e. Public Health Service and Bureau of Prison physicians)

### ***Externship***

Programs of training in medicine offered by outpatient clinics or private practices for graduates of medicine to meet the clinical requirements established by accrediting authorities.

### ***Internship***

Programs of training in medicine and medical specialties offered by hospitals for graduates of medicine to meet the requirements established by accrediting authorities.

### ***Legend Drugs***

A synonym for prescription drug. Legend drugs are required by federal law to have a prescription, or a physician's order to be dispensed by the pharmacy.

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### ***Minor Surgery***

Minor surgery is the repair of superficial wounds, removal of foreign bodies, cysts, and superficial lesions. Local antiseptics and anesthetics are employed and sterile fields are maintained. These are the procedures that primary care physicians perform in their offices.

Note: Minor surgery DOES NOT include the use of general or spinal anesthetics, specialized surgical procedures (eye surgery, tendon repair, plastic surgery etc.) or the entrance into body cavities.

### ***Pharmacognosy***

A sub-field of pharmacology which studies natural drugs, including the study of their biological and chemical components, botanical sources, and other characteristics (economic, biochemical, biological, etc.).

### ***Pharmacology***

The medical science that deals with the discovery, chemistry, effects, uses and manufacture of drugs. The study of pharmacology includes drug absorption, metabolism, distribution, excretion and the mechanisms of drug action. It classifies and describes the actions, side effects and therapeutic uses of drug prototypes from the contemporary drug classes. (ex. Antihypertensives, Diuretics etc.)

### ***Pharmacotherapeutics***

Is the clinical study by which medical students learn to use drugs to treat medical conditions under the supervision of a physician.

### ***Prescription***

A written direction for the preparation and administration of a remedy. A prescription consists of the heading or superscription that is, the symbol R or the word Recipe, meaning take; the inscription, which contains the names and quantities of the ingredients; the subscription or directions for compounding and the signature, usually introduced by the sign s. For signa, mark, which gives the directions for the patient which are to be marked on the receptacle.

### ***Prescription Drugs***

A drug requiring a prescription, a physician's order. (By comparison with an over-the-counter drug.)

### ***Primary Care***

A primary care physician is trained to provide definitive care to the undifferentiated patient at the point of first contact. They are advocates for their patients and co-ordinate the use of the entire health care system. This includes educated referral for emergency intervention or to specialized providers.

## **SB 306 & HB 434 – Naturopathic Medicine Support Documents**

### **Professionals/Instruction:**

Clyde B. Jensen, Ph.D – Expert Testimony – Teleconferenced  
Attached Resume & Letters of Support – Portland, Oregon  
Rick Chester, ND, RPh,Lac – Expert Testimony –  
Letter of Support - White City, OR

### **Other Professional Letters of Support:**

S. Lynn Hornbein, M.D. – Summit Family Practice – Anchorage  
D. Lynn Mickleson, M.D. – Palmer  
Michael Fischer, M.D. – Alaska Family Wellness Center, Inc. – Anchorage  
Craig H. Mullett, D.D.S. – Alaska Family Dental Center – Wasilla  
Elizabeth Turgeon, M.D. – Capstone Family Medicine – Wasilla  
Jeffrey W. Russell, PA-C, MHS – Anchorage  
Mary-Beth Gardner, MS FNP – Fairbanks  
Richard C. Holm, R.PH – North Pole Prescription Lab. Inc – North Pole  
Barbara Norton, CNM,ANP – Geneva Woods Birth Center – Anchorage  
Alan S. Bills, DDS – Alaska Center for Dentistry – Wasilla  
*+ others*

### **Petitioners, in support of SB 306 & HB 434:**

Database of 700+ Residents of Alaska (original signature sheets available upon request)

**CLYDE B. JENSEN, Ph.D.**

December, 2003

**CAREER DISTINCTIONS**

- Doctoral education in physiology and pharmacology and tenured medical school faculty member.
- America's youngest medical school president at age 32.
- Regarded for expertise in leading higher education institutions through difficult transitions.
- Provided senior leadership to six public and private higher education institutions by age 50.
- Singular person to provide senior leadership at a community college and at colleges of allopathic, osteopathic, naturopathic, and oriental medicine.
- Developing model scientific affairs organization for nutritional supplement industry.

**EMPLOYMENT HISTORY and SELECTED ACCOMPLISHMENTS**

<p>President and Owner</p>	<p>Continuum Biomedical Consultants, Inc. Portland, Oregon</p>	<p>2001-Present</p>
<ul style="list-style-type: none"> <li>• Developed and implemented accredited graduate medical education program to train physician investigators for the dietary supplement industry.</li> <li>• Developed and implemented SYNERGATE, a modified stage/gate new product development process for a multinational nutritional products and herbal medicine alliance.</li> <li>• Formed industry/higher education collaboration for conducting federally funded dietary supplement research and education.</li> <li>• Developed infrastructure for research, governmental affairs and professional relations for nations oldest dietary supplement company.</li> <li>• Developed and currently implementing plans for the establishment of a federal office for integrated medicine.</li> </ul>		
<p>President Professor of Pharmacology</p>	<p>National College of Naturopathic Medicine Portland, Oregon</p>	<p>1996-2001</p>
<ul style="list-style-type: none"> <li>• Secured professional accreditation for Masters Degree in classical Chinese medicine, Doctorate in naturopathic medicine and residency in naturopathic medicine.</li> <li>• Secured candidacy for regional accreditation.</li> <li>• Relocated main campus and major clinics to larger and more suitable facilities.</li> <li>• Established and presided over American Association of Naturopathic Medical Colleges.</li> </ul>		
<p>Senior Executive Adjunct Professor of Medicine</p>	<p>University of Oklahoma College of Medicine – Tulsa Tulsa, Oklahoma</p>	<p>1993-1996</p>
<ul style="list-style-type: none"> <li>• Developed and implemented campus strategic and master plans.</li> <li>• Restructured professional practice plan assisted with implementation of state-wide managed Medicaid.</li> </ul>		
<p>President (Interim)</p>	<p>Northeastern Oklahoma A&amp;M College Miami, Oklahoma</p>	<p>1992-1993</p>
<ul style="list-style-type: none"> <li>• Stabilized campus and community relations following tumultuous departure of previous president.</li> <li>• Initiate strategic and fiscal planning process for implementation by permanent president.</li> </ul>		
<p>President (Interim)</p>	<p>University of Health Sciences Kansas City, Missouri</p>	<p>1991-1992</p>
<ul style="list-style-type: none"> <li>• Stabilized campus following death of previous president.</li> <li>• Developed strategic and campus master plan for implementation by permanent president.</li> </ul>		
<p>President</p>	<p>Oklahoma State University College of Osteopathic Medicine Tulsa, Oklahoma</p>	<p>1987-1991</p>
<ul style="list-style-type: none"> <li>• Merged free-standing state supported college of osteopathic medicine with land grant university.</li> <li>• Acquired additional property and constructed new and renovated existing campus facilities.</li> </ul>		

**President** West Virginia School of Osteopathic Medicine  
Lewisburg, West Virginia 1981-1987

- Increased appropriations to from state legislature.
- Diversified revenues by contracting with other Southern Region Education Board states to train rural physicians.
- Integrated osteopathic graduate medical education into allopathic hospitals.

**Assoc. Prof. Pharmacology** Oklahoma College of Osteopathic Medicine & Surgery  
**Director of Research** Tulsa, Oklahoma 1974-1981  
**Dean of Students**

**SELECTED PART-TIME POSITIONS AND CONSULTING ASSIGNMENTS**

**Adjunct Professor of Public Health** Oregon Health & Science University  
Portland, Oregon 2003-Present

**Adjunct Professor of Health Policy** Medical College of Wisconsin  
Milwaukee, Wisconsin 2001-Present

**Sr. Consultant** Southwest College of Naturopathic Medicine  
Tempe, Arizona 1997-1999

**Adjunct Professor of Pharmacology** Rogers State University  
Claremore, Oklahoma 1993-1996

**Director of Oklahoma Operations** International Medical Technical Consultants (IMTCI)  
Overland Park, Kansas 1993-1994

**Consultant** Ross University College of Medicine  
Dominica 1992

**SELECTED LEADERSHIP ACCOMPLISHMENTS**

- Led several diverse colleges through difficult periods of transition: 1981-2001
- Testified before state legislative committees: 1981-present
- Restructured state supported medical college to serve multiple states in Appalachian Region: 1981-1987
- Testified before congressional subcommittees regarding student financial aid: 1985
- Merged public Oklahoma medical college with state land grant university: 1987-1991
- Restored harmony to private Kansas City medical college and recruited permanent president: 1991
- Restored order to public Oklahoma Community College in preparation for permanent president: 1992
- Developed professional practice plans for public medical colleges: 1981-1996
- Fostered conventional and complementary medical college collaboration: 1981-present
- Developed GME programs in conventional and complementary medicine: 1983-91 & 1996-99
- Developed industry/education partnerships for research and education: 2001- present
- Presided over research, education, product development, governmental affairs and professional relations for America's oldest dietary supplement company: 2001-present
- Developing federal office of integrated medicine; underway

**SELECTED RESEARCH ACCOMPLISHMENTS**

- Conducted and published basic research in physiology and pharmacology: 1973-1981
- Established medical school offices of research: 1979, 1994, 1996
- Organized and managed medical school institutional review boards: 1994, 1996
- Organized contract research organization for pharmaceutical clinical trials: 1993-1994
- Served as Principal Investigator in Phase III clinical trials: 1993-1994
- Facilitated IRB workshops on behalf of federal Office for Prevention of Research Risk: 1995



February 16, 2004

Daniel J. Young, N.D.  
ERNMC, Inc.  
0928 Eagle River Road,  
Suite # 254  
Eagle River, Alaska 99577-7228

Dear Dr. Young:

In my effort to write a short, crisp letter to Senator Seekins and Representative Holm concerning SB 306 and HB 434, I over simplified an observation pertaining to pharmacology that I wish to correct in this letter.

I said, "Naturopathic medical students receive instruction in minor surgery, obstetrics and pharmacology, but less than allopathic or osteopathic medical students." Medical students (including MD, DO and ND) receive two types of pharmacology instruction. Basic pharmacology is the classroom instruction in which students learn how drugs work, how the body handles them and the conditions for which they are used. Applied pharmacology or pharmacotherapeutics is the instruction in the clinic in which students observe as the physician determines which drugs to prescribe and the circumstances under which they are to be administered.

Because naturopathic medical students receive most of their clinical training under the supervision of naturopathic physicians who prescribe few drugs, naturopathic medical students receive less training in applied pharmacology or pharmacotherapeutics than do MD or DO students whose supervising physicians are MDs and DOs who frequently prescribe drugs. Instruction in basic pharmacology, however, is similar among MD, DO and ND students.

I hope this will help to clarify any confusion that may have been caused by my previous letter. I will send copies of this letter to Senator Seekins and Representative Holm. I hope you will feel free to share it with others at your discretion.

Respectfully yours,

Clyde B. Jensen, Ph.D.

Cc. Senator Ralph Seekins  
Representative Jim Holm

Standard Process Inc. • 1200 West Royal Lee Drive • P.O. Box 904 • Palmyra, WI 53156-0904  
262-495-2122 • 800-848-5061 • fax 262-495-2512 • www.standardprocess.com

February 4, 2004

Senator Ralph Seekins  
Alaska State Capital Building  
Juneau, Alaska 99801-1182

Dear Senator Seekins:

I have become aware of the bill entitled "Act Relating to Naturopathic Physicians" now pending before the Alaska state legislature and am writing to volunteer any information and experience that may assist you and your colleagues in your consideration of this bill. I am a medical educator with a Ph.D. in physiology and pharmacology.

I have had the unique experience of serving as a chief or senior executive officer in colleges of allopathic, osteopathic, naturopathic and oriental medicine, and am frequently called upon to compare their respective educational programs.

The educational experience for MDs, DOs and NDs can be divided into five stages. I will quickly and superficially compare them.

- Admissions: ND medical schools currently do not require the MCAT for admissions. In all other respects, the requirements for admission are similar.
- Basic Biomedical Sciences: Biochemistry, physiology, anatomy, microbiology and other basic biomedical sciences are presented in similar quantity and intensity in each of the three types of medical schools.
- Diagnostics: Each are taught to employ identical outpatient diagnostic technologies. Allopathic and osteopathic medical schools are able to teach in patient diagnostic technologies to which naturopathic medical students have limited access.
- Therapeutics: Naturopathic medical students are taught nutritional, herbal, homeopathic and other low risk modalities to which allopathic and osteopathic medical students receive little exposure. Naturopathic medical students receive instruction in minor surgery, obstetrics and pharmacology, but less than allopathic or osteopathic medical students. Therapeutic training of naturopathic medical students is largely confined to outpatient clinics.
- Graduate medical education: At least a year of GME is required of MDs and DOs and this training is typically reimbursed with federal dollars. GME is currently an optional medical education experience for naturopathic physicians. Because federal reimbursement is not provided, naturopathic residency slots currently exist for fewer than 10% of recent naturopathic medical school graduates.

Naturopathic physicians are uniquely prepared to contribute to the delivery of health care in Alaska because of their ability to provide high quality, low risk, out patient care. It is my understanding that the pending legislation may better enable this to occur. I feel so strongly about the goodness of fit between naturopathic medicine and health care to rural, medically underserved populations, that if invited I will volunteer to meet with interested legislators at my own personal expense. Please feel free to call upon me at your discretion.

Respectfully yours,

A handwritten signature in cursive script that reads "Clyde B. Jensen". The signature is written in dark ink and is positioned above the typed name.

Clyde B. Jensen, Ph.D.

7591 Crater Lake Hwy.  
White City, OR 97503



*Be Well & Well Informed*

tel: 541-826-9173  
fax: 541-826-8366

February 17, 2004

Senator Ralph Seekins  
Alaska State Capital Building  
Juneau, Alaska 99801-1132

Attn: Senator Seekins

I am writing to support legislative bills HB434 and SB 306, both titled "An act relating to the practice of naturopathic medicine."

As a pharmacist and naturopathic physician, I taught pharmacology at the Southwest College of Naturopathic Medicine in Tempe Arizona and wrote pharmacology test questions for the naturopathic board exam. I also created the original formulary used in Arizona and later used in Oregon, which included drugs derived from natural sources. As an instructor, I taught students to thoroughly research the warnings and precautions of each drug they prescribed, so they were aware of the possible harm they might cause to their patients. The test questions I wrote required knowledge of pharmacology necessary to protect the public safety. The formulary system, which I have had to practice under, is antiquated and actually has a negative effect on public safety. The formulary forces naturopathic physicians to choose less than optimal drugs over more effective newer medications.

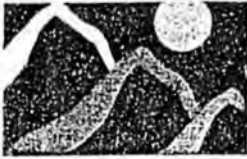
As a provider, I know that naturopathic physicians, like MDs, regularly prescribe a handful of drugs with which they are quite familiar. Unlike medical doctors, naturopathic physicians prescribe medications as a last resort, treat fewer patients each day, and are less likely to place individuals on multiple drug regimens, which lead to interactions and complications. As general practice physicians seeing fewer patients on a daily basis, naturopathic doctors have much more time to research the consequences of drug therapy than do their MD or DO colleagues.

In Oregon, where I practice, medical care has been shifted to nurse practitioners with less education than naturopathic physicians. It is irrational for trained primary care physicians to be limited to non-drug therapies at a time when access to quality health care is becoming scarce. Consequently, I support legislation that allows naturopathic physicians to practice commensurate with their education and to the full scope of their training. Please support this Bill.

Sincerely,

Rick Chester, ND, RPh, LAc

[cascadepharmacy.com](http://cascadepharmacy.com)



Summit  
Family  
Practice

2741 DeBarr Road #C-308  
Anchorage, Alaska 99508  
Telephone: 907-272-3366

FEB 6 2004

January 22, 2004

Senator Ralph Seekins  
Representative Jim Holm  
Alaska State Capital Building  
Juneau, Alaska 99801-1182

ATTN: Senator Seekins  
Representative Holm

I am writing in support of the legislative bill: an "Act Relating to Naturopathic Physicians".

Having practiced family medicine in Alaska for over 13 years, I have gotten to know the medical community well, including a number of naturopathic physicians. I have collaborated with Daniel J. Young N.D., LAc. and Madeleine Morrison-Young, ND of, Eagle River Naturopathic Medical Center regarding mutual patients on numerous occasions. They are highly skilled professionals, and are knowledgeable and competent in the care of our shared patients. Their areas of expertise (naturopathy, homeopathy, Chinese Medicine and acupuncture) are complementary to the allopathic (Western) medicine approach to health. My patients benefit from their care, and express satisfaction with the level of care provided.

I support legislation that allows naturopathic physicians to practice the full scope of naturopathic medicine, commensurate with their education. Such legislation will improve access to effective and safe complementary medical practices and enhance Alaskans' freedom of choice in health care.

Sincerely,

S. Lynn Hornbein, M.D.

**D. LYNN MCKELSON, MD**

440A W. Evergreen  
Palmer, Alaska 99645  
Phone: (907) 745-3980 Fax: (907) 745-2163

January 23, 2004

Senator Ralph Seakins  
Representative Jiri Holm  
Alaska State Capitol Building  
Juneau, Alaska 99901-1182

ATTN: Senator Seakins  
Representative Holm

I am writing this letter to support the legislative bill regarding an "Act Relating to Naturopathic Physicians". As a physician/MD practicing in Palmer, Alaska I have had the opportunity to share patients with both Drs. Cary Jasper and Tony Smith in Anchorage as well as Dr. Dan Young (of the Eagle River Naturopathic Center). I have found them all to be professional, knowledgeable and competent in the care of our shared patients.

In this era of ever rising health care costs - 1.7 TRILLION dollars as a recent estimate for the cost of health care in the US - the preventative care approach of naturopathic physicians is very valuable in overall health care and the reduction of costs. Their treatments are frequently effective in those cases where conventional approaches have not worked and have far fewer negative effects. We need gentler therapies available.

I support legislation that allows naturopathic physicians to practice commensurate with their education and to the full scope of their training. Such legislation offers Alaskans freedom of choice in their healthcare and improved access to effective and safe, complementary medical practices. This can only benefit the healthcare community in Alaska.

Please support this bill. Feel free to call me at the above number.

Sincerely,



D. Lynn McKelson, MD

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TM 1 60:81 0002 92 WFG 1592-517-206-1:fax F D W unse1kpcim uuft D



## Alaska Family Wellness Center, Inc.

4200 Lake Otis Pkwy, Suite 304  
Anchorage, AK 99508  
Phone (907) 561-9444  
Fax (907) 561-9446

FEB 6 04

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January 21, 2004

Senator Ralph Seekins  
Representative Jim Holm  
Alaska State Capitol Building  
Juneau, AK 99801-1182

To Whom It May Concern:

I am writing this letter to support the legislative bill an "Act relating to naturopathic physicians." As a medical doctor practicing in the state of Alaska I have had the opportunity to share patients with, and interact with Dr. David Newirth of the Alaska Family Wellness Center, Inc on several occasions. In fact, I have employed him on my staff for the last year. I have found him to be professional, knowledgeable, and competent in the care of our shared patients. In addition, the patients that I have shared with Dr. Newirth have demonstrated satisfaction with the level of care provided.

I support legislation that allows naturopathic physicians to practice commensurate with their education, and to the full scope of their training. Such legislation offers Alaskans freedom of choice in their healthcare, and improved access to effective and safe complementary medical practices. This can only benefit the healthcare community in Alaska. Please support this Bill.

If you would like to discuss this further with me, please contact me at 561-9444.

Sincerely,

Michael Fischer MD

CC: The Alaska Association of Naturopathic Physician, Inc.



*Craig H. Mullett, D.D.S.*

GENERAL DENTISTRY

ALASKAN FAMILY DENTAL CENTER, LLC

281 NORTH MAIN STREET

SUITE 201

WASILLA, ALASKA 99654

February 14, 2004

Senator Ralph Seekins  
Representative Jim Holm  
Alaska State Capital Building  
Juneau, Alaska 99801-1182

ATTN: Senator Seekins, Representative Holm.

Dear Sir,

I am writing this letter to support the legislative bill an "Act relating to naturopathic physicians." As a dentist practicing in the state of Alaska I have had the opportunity to share patients with, and interact with Drs. Dan and Madeleine Young of Eagle River's Naturopathic Medical Center Inc. on several occasions. I have found them to be professional, knowledgeable, and competent in the care of our shared patients. In addition, the patients that I have shared with the Young's have demonstrated satisfaction with the level of care provided. Dr. Dan Young has treated me personally, as a patient, with excellent results.

I support legislation that allows naturopathic physicians to practice commensurate with their education, and to the full scope of their training. Such legislation offers Alaskans freedom of choice in their healthcare, and improved access to effective and safe complementary medical practices. This can only benefit the healthcare community in Alaska. Please support this Bill.

If you would like to discuss this further with me, please contact me at Alaskan Family Dental Center LLC, 281 North Main Street, Suite 201, Wasilla, Alaska, 99654.

(907) 376-0452

Sincerely,

  
Craig H. Mullett DDS

December 13, 2003

Representative Nancy Dahlstrom  
10982 Eagle River, AK 99657

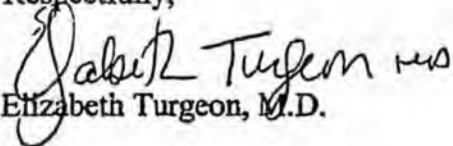
Dear Representative Dahlstrom,

I am writing this letter to support the legislative bill an "Act relating to naturopathic physicians." As a medical doctor practicing in the state of Alaska I have had the opportunity to share patients with, and interact with David Newirth, N.D. In fact, as chief of staff at Cordova Community Medical Center I felt his contributions to patient care merited him obtaining medical staff privileges in Cordova. I have found him to be professional, knowledgeable, competent and well received by patients I have referred to him. With many Alaskans choosing alternatives to allopathic care, I find it very important to have trained, licensed and competent individuals for patients as well as allopathic providers to consult.

I support legislation that allows naturopathic physicians to practice commensurate with their education and to the full scope of their practice. Such legislation offers Alaskans freedom of choice in their healthcare, and improved access to effective and safe complementary medical practices. This can only benefit the healthcare community in Alaska. Please support this Bill.

If you would like to discuss this further with me, please contact me at Capstone Family Medicine Clinic, 907-357-9590.

Respectfully,

  
Elizabeth Turgeon, M.D.

Capstone Family Medicine  
3223 E. Palmer Wasilla Hwy  
Garrett Building #2  
Wasilla, AK 99654  
Phone 907-357-9590 fax-907-357-9593



Summit  
Family  
Practice

2741 DeBarr Road #C-308  
Anchorage, Alaska 99508  
Telephone: 907-272-3366

November 12, 2003

Representative Nancy Dahlstrom  
10928 Eagle Rive Road, Ste. 238  
Eagle River, Alaska 99577

Dear Ms. Dahlstrom:

I am writing to express my support for the legislative bill an "Act relating to naturopathic physicians." I am a physician assistant in private family practice in Anchorage and have collaborated in the health care of mutual patients with naturopathic physicians Drs. Daniel J. Young and Madeleine Morrison-Young both associated with the Naturopathic Medical Center in Eagle River. My practice experience leads me to recommend complimentary health treatment approaches involving different disciplines of medical practice whenever indicated. Invariably, my clients have benefited from health management performed by Drs. Young and Morrison-Young. My interaction with these naturopathic physicians by phone and in person has repeatedly confirmed their medical competence, knowledge, and professionalism. Our mutual clients have always reported satisfaction with the health care rendered in their clinic.

I support legislation permitting naturopathic physicians to practice appropriate to their education and the expertise developed in their long years of medical school and residency. Such legislation provides Alaskans with fully developed health care resources incorporating safe and effective choices appropriate to their personal philosophies of health management, as well as the benefit of more expeditious and cost effective treatment options. Giving Alaskans health care options that are maximized to their full potential will further advance the effectiveness of the greater community of medical practitioners in the State. I urge you to support this Bill.

If I can provide further perspective on this issue, please do not hesitate to contact me at Summit Family Practice, (907) 272-3366.

Sincerely,

Jeffrey W. Russell, PA-C, MHS



# Alaska Center for Natural Medicine

104 Kutter Road • Fairbanks, Alaska 99701 • (907) 452-3600

FEB 23 2004

Senator Ralph Seekins  
Representative Jim Holm  
Alaska State Capital Building  
Juneau, Alaska 99801-1182

Mary-Beth Gardner, FNP, CNM

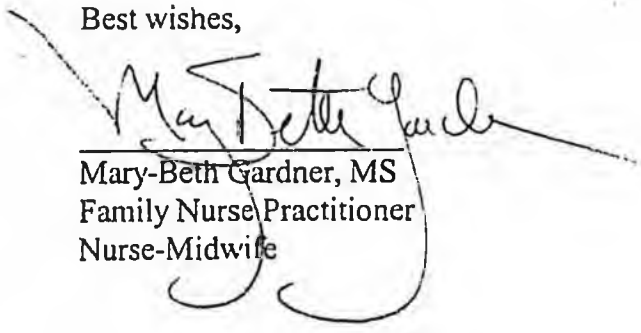
February 16, 2004

The purpose of this letter is to support legislation that grants prescriptive authority to naturopathic physicians.

I have practiced as an advanced nurse practitioner for 18 years – 15 years in Alaska. Much evolution in health care delivery has occurred during this time. State of the Art health care practices in the United States now incorporate allopathic (or typical western medicine) and naturopathic treatments for the best patient outcomes. Naturopaths are trained in the application of these two methods. Their ability to practice is hindered by restriction of prescriptive privileges. And, Alaskans' access to this skillful blending of healthcare is limited while prescriptive privileges are withheld.

Please call me if I can provide further information.

Best wishes,

  
Mary-Beth Gardner, MS  
Family Nurse Practitioner  
Nurse-Midwife

February 14, 2004

FEB 23 2004

Senator Ralph Seekins  
Alaska State Capitol Building  
Juneau, AK 99801-1182

ATTN: Senator Seekins (Bill #306)

Dear Senator Seekins,

I am writing this letter to support the legislative Bill #306, an "Act relating to Naturopathic Physicians." As a compounding pharmacist practicing in Alaska, I have had the opportunity to refer patients and interact with Dr. Scott Luper N.D. of the Alaska Center for Natural Medicine in Fairbanks, as well as others on several occasions. I have found them to be professional, knowledgeable, and very competent in the care of our mutual patients. Additionally, these patients not only have demonstrated satisfaction with the level of care provided but clearly have benefited from this care. As a compounding pharmacist I see patients every day that would benefit greatly from the expanded scope of practice this bill would provide. It makes no sense to continue to limit their scope of practice and deny Alaskans the full benefit that can be derived through passage of the present legislation. Many other states have already come to this realization, including our nearest neighbor Washington State. Washington has for a long time now provided this expanded practice to their citizens, with great success and safety.

I support legislation that allows naturopathic physicians to practice commensurate with their education, and to the full scope of their training. Such legislation offers Alaskans freedom of choice in their healthcare, and improved access to effective and safe complementary medical practices. This can only benefit the healthcare community in Alaska. Please support this Bill.

If you would like to discuss this further with me, please contact me at:

907-488-8555 (work)  
907-488-8556 (fax)  
[nprxlab@hotmail.com](mailto:nprxlab@hotmail.com) (email)

Sincerely,

A handwritten signature in black ink, appearing to read "Richard C. Holm R.Ph.", written over a horizontal line.

Richard C. Holm, R.Ph., F.A.C.A., F.I.A.C.P., F.A.Ph.A.  
North Pole Prescription Laboratory Inc.  
167 S. Santa Claus Lane  
North Pole, AK 99705  
Phone: 488-8555  
Fax: 488-8556



# Geneva Woods Birth Center

November 11, 2003

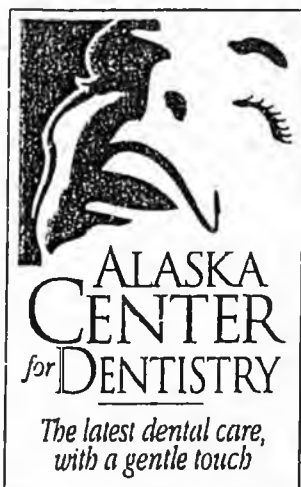
Representative Nancy Dahlstrom  
10928 Eagle River Road, Ste. 238  
Eagle River, Alaska 99577

I am writing this letter to support the legislative bill an "Act relating to naturopathic physicians." As a Nurse Practitioner and midwife in the state of Alaska I have had the opportunity to share patients with, and interact with Dr. Morrison-Young on several occasions. She is professional, knowledgeable, and competent in the care of our shared patients. In addition, the patients that I have shared with Dr. Morrison-Young have demonstrated satisfaction with the level of care that she provides. It seems unnecessary for her to refer patients to me for simple prescriptive items such as birth control pills, hormones, and Fosimax when she herself is well trained to provide these directly to her patients.

I support legislation that allows naturopathic physicians to practice commensurate with their education, and to the full scope of their training. Such legislation offers Alaskans freedom of choice in their healthcare, and improved access to effective and safe complementary medical practices. This can only benefit the healthcare community in Alaska. Please support this Legislation.

Sincerely,

Barbara Norton CNM  
ANP



February 13, 2004

Senator Ralph Seekins  
 Alaska State Capital Building  
 Juneau, Alaska 99801-1182

I am writing this letter in support of the legislative bill an "Act relating to naturopathic physicians." As a dentist practicing in the state of Alaska I have had opportunity to share patients with, interact and consult with several of our naturopathic physicians practicing in Alaska; most notably Drs. Madeleine Morrison-Young, Daniel Young and Torrey Smith. I have always found them to be professional and very competent in the care of our shared patients, and to be extremely knowledgeable and an invaluable reference source in furthering my professional knowledge.

I am fully in support of legislation that allows naturopathic physicians to practice commensurate with their education, and to the full scope of their training. Such legislation offers Alaskans much greater freedom of choice in their healthcare, as well as a much needed improvement in access to effective and safe complementary medical practices. This can only benefit the healthcare community in Alaska. Please support this Bill.

If you would like to discuss this further with me, please contact me at my office, or at [alan@alaskacenterfordentistry.com](mailto:alan@alaskacenterfordentistry.com)

Sincerely,

Alan S. Bills, DDS

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 techniques end  
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No-needle  
 anesthesia  
 available

Soothing  
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Sandra C. Denton, M.D.  
& Associates



Alaska Alternative Medicine Clinic, L.L.C.  
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2/16/2004

Senator Ralph Seekins  
State Capitol Building, room 125  
Juneau, AK 99801-1182

Dear Senator Seekins,

As a medical doctor who has specialized in alternative medicine since 1985, I have had numerous occasions to work with naturopathic physicians in Alaska and have worked closely with them as part of our team of providers at my office.

It is unrealistic to expect the State of Alaska's Department of Occupational Licensing to regulate the standards of health care providers such as naturopathic physicians without consultation with their professional association. Physicians are in a much better position to assess the conduct of their peers and hold them to high standards of quality, ethics and professionalism. Even the most enlightened bureaucrat would not possess knowledge of what is customary in naturopathic medical practice and what their training allows them to do safely.

I have watched the naturopathic profession grow in the past 18 years, the demand for a balance between conventional and natural medicine from patients is best assured if the scope of practice of naturopathic physicians is commensurate with their level of training. When patients have to make an appointment to see another provider to obtain a prescription medication when diet, exercise, botanical and other natural medicines are insufficient, it creates a barrier to care that does not serve the health care needs of the patient, especially in remote areas of the state where any kind of licensed health care provider is difficult to come by. Most other states that have licensure for naturopathic physicians have prescription writing authority tied to continuing education requirements in order to protect the public and provide access to comprehensive treatment. Alaska should do the same.

Thank-you for your attention in this important piece of legislation.

Yours in health,

Sandra C. Denton, MD  
Medical Director

3333 Denali Street, Suite 100 • Anchorage, Alaska 99503  
Phone (907) 563-6200 • Fax (907) 561-4933  
Email: aamc@myexcel.com

*See part*

**Gene Meiergerd RN, LMT**  
Licensed Massage Therapist

**Movement Toward Health**

February 15, 2004

Senator Ralph Seekins  
Representative Jim Holm  
Alaska State Capitol Building  
Juneau, Alaska 99801-1182

ATTN: Senator Seekins  
Representative Holm

I am writing this letter to support the legislative bill an "Act relating to naturopathic physicians". As a practicing RN for over 25 years and a certified therapeutic massage therapist I have had the opportunity to interact with Dr. Dan Young on several occasions. I have found him to be professional, knowledgeable and competent as well as going out of his way to see that patients receive the best possible care.

I support legislation that allows naturopathic physicians to practice in accord with their education, and the full scope of their training. This legislation offers Alaskans freedom of choice in their healthcare, and improved access to effective and safe complementary medical practices. This can only benefit the healthcare community in this great state of Alaska. Please support this bill.

Sincerely,

*Eugene N Meiergerd*  
Eugene N Meiergerd RN, MA, CMT



Alaska Association of Naturopathic Physicians, Inc.  
*Dedicated to the preservation of quality naturopathic medicine for all Alaskans.*

February 25, 2004

Senator Lyda Green, Co-Chair Finance  
Alaska State Senate  
Capitol Building  
Juneau, Alaska 99811

Dear Senator Green,

On behalf of the thousands of naturopathy patients that we service in the Eagle River, Mat-Su and South-central Alaska, I would like to thank you for your co-sponsorship of SB306. Your time and attention to this important issue is extremely appreciated.

Thank you for allowing us to respond to the concerns raised to you by Cathy Giessel, MS, FNP-CS. In addition to the answers to her questions noted below, we have provided you with an education and training comparison of all health care professions in Alaska.

**Naturopathic medical colleges are four-year postgraduate schools with admissions requirements comparable to those of conventional medical schools.** To apply to naturopathic medical school an undergraduate with premedical emphasis is required. A Doctorate in Naturopathic Medicine requires four years of graduate level study in the medical sciences: anatomy, biochemistry, cardiology, clinical and physical diagnosis, dermatology, gynecology, immunology, lab diagnosis, microbiology, minor surgery, neurology, obstetrics, pathology, pediatrics, pharmacology, physiology, radiology, as well as other clinical sciences.

In addition to basic and clinical sciences, NDs also receive training in naturopathic therapeutics including; botanical medicine, Chinese medicine and acupuncture, homeopathy, hydrotherapy, natural childbirth, naturopathic manipulation, psychology and counseling, therapeutic nutrition, and other therapies. **Because coursework in natural therapeutics is added to a standard medical curriculum, naturopathic doctors receive significantly more hours of classroom education in these areas than the graduates of many leading medical schools, including Yale, Stanford and Johns Hopkins schools.** This becomes obvious upon examination of the comparison sheets that are enclosed.

Thank you again for allowing us the opportunity to provide a factual response to these questions and to further educate other health care professions in Alaska about the practice of naturopathic medicine. We look forward to working together with all health care professionals to ensure the public safety, welfare, and affordability of quality complementary care for all Alaskans.

Sincerely,

*Daniel Young, ND, LAc.*

Daniel J. Young ND, LAc.  
*Alaska Association of Naturopathic Physicians, Inc.*  
*Legislative Task Force*

Eric. Comparing Medical Professions in Alaska

## Comparison of Educational & Pharmacology Training Allopathic (MD's) and Naturopathic (ND's)

Just as biochemistry is biochemistry, pharmacology is pharmacology. Pharmacology, like biochemistry, is a basic science -- usually taught in the first two years of medical school. Pharmacology training for naturopathic doctors is fundamentally the same as the training other primary care doctors receive.

**Table 1** (shown below) compares the total hours required of three medical disciplines in the basic sciences, including pharmacology.

**Table 2** compares the total hours of clinical clerkships and therapeutics required by six different medical colleges, three naturopathic medical schools and three allopathic (MD) medical schools.

In the 13 states where naturopathic physicians have prescription rights

- ⇒ Naturopathic physicians must graduate from a CNME-approved naturopathic medical college (Federally Approved)
- ⇒ Pass the pharmacology exam as administered by NPLEX (Naturopathic Physicians Licensing Examination) (Federally Approved)
- ⇒ Be licensed by the state where they practice
- ⇒ Obtain a Drug Enforcement Agency (DEA) registration number.
- ⇒ Remain current with continuing education required by the state

With these stringent requirements met, NDs in these states SAFELY prescribe, or administer prescription or controlled substances WHEN THEY NEED TO.

To further assure public safety in Alaska, our regulations will require a mandatory, 60-hour course taught by pharmacists (R.Ph.) and by Pharm.D.s (pharmacists who are also MDs) which focuses on pharmacotherapeutics (the therapeutic use of drugs). This will ensure that naturopathic doctors who graduated long ago will have their knowledge brought up to current provisions.

**Table 1. Comparison of Average Number of Hours in Basic Science Instruction**

	Allopathic <sup>1</sup>	Osteopathic <sup>2</sup>	Naturopathic <sup>3</sup>
Anatomy (gross and micro)	380	362	350
Physiology	125	126	250
Biochemistry	109	103	125
Pharmacology	114	108	100
Pathology	166	152	125
Microbiology/Immunology	185	125	175

Sources:

<sup>1</sup>Ref. Association of American Medical Colleges Curriculum Directory, 1996-1997.

<sup>2</sup>Ref. 1996 Statistical Report. Chevy Chase, MD: American Association of Colleges of Osteopathic Medicine.

<sup>3</sup>Ref. State of Oregon, Oregon Administrative Rules, Oregon Board of Naturopathic Examiners, Chapter 850. Salem, OR.

Note: Allopathic (MD); Osteopathic (DO); Naturopathic (ND)

Used with Permission; *Common Paths in Medical Education*, Clyde B. Jensen, Ph.D., Alternative and Complementary Therapies; August 1997

**Table 2: Comparison of major naturopathic and allopathic medical school clinical training**

Clerkships and Clinical Therapeutics	National (ND)	Bastyr (ND)	Southwest (ND)	John Hopkins (MD)	Yale (MD)	Stanford (MD)
Total Hours	3120	2833	3050	3391	2891	3897

Sources:

American Association of American Medical Colleges, Curriculum directory (1996-1997)

National College of Naturopathic Medicine catalogs (1995-1997)

Bastyr University of Naturopathic Medicine and Health Sciences catalogs (1996-98)

Southwest College of Naturopathic Medicine and Health Sciences catalogs (1996 - 1998)

Appendix C  
 A Comparison of Licensed Medical Professions  
 In The State of Alaska

Licensed Practical Nurse	9 months to 2 year practical nursing program, the 1 year program being the most common
Registered Nurse	One of the following: <ul style="list-style-type: none"> <li>• A 2-yr. Associate's degree, or</li> <li>• A 3-yr. Diploma program, (hospital based), or</li> <li>• A 4-yr. Bachelor's degree in nursing, or</li> <li>• A 4-yr. Bachelor's degree in another discipline and a 3-yr. Master's degree in nursing, or</li> <li>• A 4-yr. Bachelor's degree in another discipline and a 4-yr. Nursing Doctorate program</li> </ul>
Advanced Registered Nurse Practitioner	In addition to holding a license as a Registered Nurse, an A.R.N.P. completes one of the following: <ul style="list-style-type: none"> <li>• A 9 month to 2 year certificate program in specialty, or</li> <li>• A 2 year Master's degree certified in specialty</li> </ul>
Physician's Assistant (PA)	4-yr. Bachelor's degree and 18 to 24 months master's degree (must work under the supervision of a physician)
Allopathic Physician (MD)	4-yr. Bachelor's degree in pre-medical and 2 to 5 years of post-graduate training in allopathic medical school; internship, residency
Naturopathic Physician (ND)	4-yr Bachelor's degree with pre-medical/science emphasis and 4 to 5 years post-graduate training in naturopathic medical school; externship required for graduation; residency options becoming more available

Galloway	Yolande	PO Box 2908	Soldotna	99669 (907)262-1493	Representative Kelly Wolf	Senator Thomas Wagoner
Gardner	Kay	PO Box 325	Soldotna	99669 (907)260-9254	Representative Kelly Wolf	Senator Thomas Wagoner
Gibson	Susan	PO Box 2325	Soldotna	99669 (907)252-9329	Representative Kelly Wolf	Senator Thomas Wagoner
Hansen	Ramela R.	309 Riverside Dr.	Soldotna	99669 (907)262-4964	Representative Kelly Wolf	Senator Thomas Wagoner
Lamb	Dawn	379 Lupine	Soldotna	99669 (907)262-9979	Representative Kelly Wolf	Senator Thomas Wagoner
Martin	Gail	PO Box 3249	Soldotna	99669 (907)262-9304	Representative Kelly Wolf	Senator Thomas Wagoner
Omar	Kristin	35555 Spur Hwy	Soldotna	99669 (907)262-8733	Representative Kelly Wolf	Senator Thomas Wagoner
Payment	Amorette	35224 West Brook	Soldotna	99669 (907)260-6144	Representative Kelly Wolf	Senator Thomas Wagoner
Payment	Steve	35224 West Brook	Soldotna	99669 (907)260-6141	Representative Kelly Wolf	Senator Thomas Wagoner
Schmitter	Lisa	PO Box 3194	Soldotna	99669 (907)262-7852	Representative Kelly Wolf	Senator Thomas Wagoner
Senanens	Susan	36574 Mackey Lake	Soldotna	99669 (907)2-3022	Representative Kelly Wolf	Senator Thomas Wagoner
Cleveland	John C.	34494 King Salmon	Sterling	99672 (907)229-3475	Representative Mike Chenault	Senator Thomas Wagoner
Abbott	Phoebe Jane	PO Box 75	Sterling	99672 (907)262-5391	Representative Mike Chenault	Senator Thomas Wagoner
Fisher	Doh	PO Box 1090	Sterling	99672 (907)262-9211	Representative Mike Chenault	Senator Thomas Wagoner
Ramsey	Linda	PO Box 319	Talkeetna	99676 (907)733-1419	Representative Beverly Masek	Senator Scott Ogan
Hanson	Margaret	Box 804	Valdez	99686 (907)835-3762	Representative John Harris	Senator Gene Theriault
Schnell	Bill	Box 701	Valdez	99686 (907)835-2359	Representative John Harris	Senator Gene Theriault
Schnell	Tracee	Box 701	Valdez	99686 (907)835-2359	Representative John Harris	Senator Gene Theriault
Craig	Rosemary	PO Box 874906	Wasilla	99687 (907)376-3979	Representative Vic Kohring	Senator Lyda Green
Gilpin	Monica	4520 Merrill Cir	Wasilla	99654 (907)373-2610	Representative Vic Kohring	Senator Lyda Green
Owen	Robert	HC33, Box 3031	Wasilla	99654 (907)376-9081	Representative Vic Kohring	Senator Lyda Green
Polis	Jennifer	PO Box 870438	Wasilla	99687 (907)357-7074	Representative Vic Kohring	Senator Lyda Green
Schroeder	Susan M	HC31 Box 5204	Wasilla	99654 376-8055	Representative Vic Kohring	Senator Lyda Green
Bills	Alan S.	PO Box 871109	Wasilla	99657 (907)357-1440	Representative Vic Kohring	Senator Lyda Green
Bills	Jennifer	PO Box 871109	Wasilla	99657 (907)357-1440	Representative Vic Kohring	Senator Lyda Green
Burgess	Susan	3332 Naom Ave.	Wasilla	99654 (907)376-4075	Representative Vic Kohring	Senator Lyda Green
Faucher	Cynthia	PO Box 877676	Wasilla	93687 (907)357-2658	Representative Vic Kohring	Senator Lyda Green
Leader	Cally	4660 W Beverly Lk Rd	Wasilla	99654 (907)376-4335	Representative Vic Kohring	Senator Lyda Green
Paulson	Anthony	PO Box 875317	Wasilla	99687 (907)357-6095	Representative Vic Kohring	Senator Lyda Green
Schleien	Ley	5055 Fernwood Dr.	Wasilla	99654 (907)373-0623	Representative Vic Kohring	Senator Lyda Green
Westbrook	Jeri	7362 W. Parks, #323	Wasilla	99654 (907)357-3424	Representative Vic Kohring	Senator Lyda Green
Barker	Susanne	530 Hjellen Dr.	Wasilla	99654 (907)376-1071	Representative Vic Kohring	Senator Lyda Green
Chapman	Michelle	HC 33 Box 3032	Wasilla	99654 (907)373-1203	Representative Vic Kohring	Senator Lyda Green
Tague Lloyd	Carolyn	4381 E Birchwood	Wasilla	99654 (907)376-7660	Representative Vic Kohring	Senator Lyda Green
White	Dianna R.	PO Box 726	Whittier	(907)247-2479	Representative Mike Hawker	Senator Con Bunde
White	Gary Donn	PO Box 726	Whittier	(907)247-2479	Representative Mike Hawker	Senator Con Bunde
Carter	Christine M.	HC89, Box 1424	Willow	99688 (907)495-4955	Representative Beverly Masek	Senator Scott Ogan
Grayhorse	Thomas R.	HC89 Box 442	Willow	99688-495-8016	Representative Beverly Masek	Senator Scott Ogan
Mathis	Shella				Representative James A. Holm	Senator Gary Wilken

Dukes	Terrl	2467 Arctic Cache Way	North Pole	99705 (907)490-3067	Representative John B. Coghill, Jr.	Senator Gene Therriault
Hunt	Gup	2751 Silver St.	North Pole	99705 (907)488-7586	Representative John B. Coghill, Jr.	Senator Gene Therriault
Therriault	Donna M.	605 Blanket Blvd.	North Pole	99705 (907)488-9589	Representative John B. Coghill, Jr.	Senator Gene Therriault
Therriault	Hector	605 Blanket Blvd.	North Pole	99705 (907)488-9589	Representative John B. Coghill, Jr.	Senator Gene Therriault
Wolff	Debra	PO Box 55162	North Pole	99705 (907)488-0307	Representative John B. Coghill, Jr.	Senator Gene Therriault
Zallee	Sue	3336 Lineman	North Pole	99705 (907)488-5269	Representative John B. Coghill, Jr.	Senator Gene Therriault
Cunningham	John W.	PO Box 57387	North Pole	99705 (907)488-3097	Representative John B. Coghill, Jr.	Senator Gene Therriault
Fye	Marilyn	4989 Adams Ave.	North Pole	99705 (907)488-4962	Representative John B. Coghill, Jr.	Senator Gene Therriault
Price	Barbara	3645 Anton	North Pole	99705 (907)458-1443	Representative John B. Coghill, Jr.	Senator Gene Therriault
Rookard	Karen	1691 Hammock	North Pole	99705 (907)488-8933	Representative John B. Coghill, Jr.	Senator Gene Therriault
Wood	Kirsten	9095 E. Gold Pan Dr.	Palmer	99645 632-1387	Representative John Harris	Senator Gene Therriault
Montella	Rita Ann	1740 Heirloom Cir. #B	Palmer	99645 (907)746-3672	Representative Carl Gatto	Senator Lyda Green
Montella	Robert	1740 Heirloom Cir. #B	Palmer	99645 (907)746-3672	Representative Carl Gatto	Senator Lyda Green
Weiland	AnneMarie	221 N. Irene	Palmer	99645 (907)746-4838	Representative Carl Gatto	Senator Lyda Green
Blaylock	Kenneth	12287 W. Arctic Ave.	Palmer	99645 (907)746-6045	Representative Carl Gatto	Senator Lyda Green
Brown	Debra D.	8634 E. Empire Cir.	Palmer	99645 (907)745-5300	Representative Carl Gatto	Senator Lyda Green
Crippen	Harry	PO Box 1327	Palmer	99645 (907)745-6555	Representative Carl Gatto	Senator Lyda Green
Fisher	Juevo L.	HC05 Box 9952	Palmer	99645 (907)745-7104	Representative Carl Gatto	Senator Lyda Green
Helig	Teresa	755 W. Fern Ave.	Palmer	99645 (907)745-8265	Representative Carl Gatto	Senator Lyda Green
Houston	Lori	HC02 Box 7826-A4	Palmer	99645 (907)745-8590	Representative Carl Gatto	Senator Lyda Green
Mandelbaum-Poj	Ruth	17300 Family Circle	Palmer	99645 (907)746-7283	Representative Carl Gatto	Senator Lyda Green
Sobczak-Cripper	Cheri Anne	PO Box 1327	Palmer	99645 (907)745-6555	Representative Carl Gatto	Senator Lyda Green
Thuggard	Robert	HC05 Box 9774B	Palmer	99645 (907)746-1700	Representative Carl Gatto	Senator Lyda Green
Zello	Chris	HC #5 Box 9782	Palmer	99645 (907)746-0243	Representative Carl Gatto	Senator Lyda Green
Andrews	Mark	241 E. Eagle Ave.	Palmer	99645 (907)745-4362	Representative Carl Gatto	Senator Lyda Green
Ben-East	Dulce	PO Box 2267	Palmer	99645 (907)373-1309		Senator Lyda Green
Petty	Christel	HC01 Box 6258	Palmer	99645 (907)373-7785		Senator Lyda Green
Porter	Jennifer	HC03 Box 8392	Palmer	99645 (907)746-4789		Senator Lyda Green
Howarth	Caralyn Blake	PO Box 2844	Palmer	99645 (907)745-2401	Representative Bill Stoltze	Senator Scott Ogen
Howarth	Lee George	PO Box 2844	Palmer	99645 (907)745-2401	Representative Bill Stoltze	Senator Scott Ogen
Howarth	Louis David	PO Box 2844	Palmer	99645 (907)745-2401	Representative Bill Stoltze	Senator Scott Ogen
Shales	Beth	PO Box 431	Palmer	99645 (907)745-7270	Representative Bill Stoltze	Senator Scott Ogen
Eshbaugh	Karen	HC04 Box 9023G	Palmer	99645 (907)746-4774	Representative Bill Stoltze	Senator Scott Ogen
Bean	River	HC04 Box 9043	Palmer	99645 (907)746-1087		
Echert	Gayle	HC04 Box 9314A	Palmer	99645 (907)745-4471		
Johnson	Steve	PO Box 670874	Peters Creek	99567 688-9782	Representative Pete Kott	Senator Fred Dyson
Tait	Carment	21109 Frosty	Peters Creek	99567 688-9627	Representative Pete Kott	Senator Fred Dyson
Davis	Mary	66840 Highline Trail	Salcha	99714 (907)488-0564	Representative John Harris	Senator Gene Therriault
Tate	Carolynn	7027 Sewell Dr.	Salcha	99714 (907)488-9538	Representative John Harris	Senator Gene Therriault
Butters	Stella	295 Riverside Dr.	Soldotna	99669 (907)262-3981	Representative Kelly Wolf	Senator Thomas Wagoner
Cooper	Linda	38778 Sterling Hwy	Soldotna	99669 (907)262-9759	Representative Kelly Wolf	Senator Thomas Wagoner
Day	Jeanne	PO Box 1375	Soldotna	99669 (907)260-4614	Representative Kelly Wolf	Senator Thomas Wagoner

Korpi	Marsha	PO Box 1033	Homer	99603 (907)235-7674	Representative Paul Seaton	Senator Gary Stevens
LaRue	Blake	PO Box 3306	Homer	99603 (907)235-4980	Representative Paul Seaton	Senator Gary Stevens
McCann	Claire	PO Box 4093	Homer	99603 (907)235-7000	Representative Paul Seaton	Senator Gary Stevens
Moore	Maureen	1614 Saltwater Dr	Homer	99603 (907)226-2338	Representative Paul Seaton	Senator Gary Stevens
Oberstein	Sally	556 Cowles Way	Homer	99603 (907)235-2308	Representative Paul Seaton	Senator Gary Stevens
Parsons	Gail	PO Box 2397	Homer	99603 (907)235-3978	Representative Paul Seaton	Senator Gary Stevens
Patty	Laura	PO Box 2902	Homer	99603 (907)235-0173	Representative Paul Seaton	Senator Gary Stevens
Poore	Deborah	710 Waddell St	Homer	99603 (907)235-6266	Representative Paul Seaton	Senator Gary Stevens
Quorton	Margaret	PO Box 1345	Homer	99603 (907)235-6807	Representative Paul Seaton	Senator Gary Stevens
Reedy-Huffman	Amy	57007 Beasley Lane	Homer	99603 (907)235-4774	Representative Paul Seaton	Senator Gary Stevens
Roderick	Paul	PO Box 836	Homer	99603 (907)235-8462	Representative Paul Seaton	Senator Gary Stevens
Schollengerger	Mark	PO Box 3593	Homer	99603 (907)235-7601	Representative Paul Seaton	Senator Gary Stevens
Sider	Madeline	250 Herndon Dr.	Homer	99603 (907)235-9114	Representative Paul Seaton	Senator Gary Stevens
Sortor	Paulette	PO Box 34	Homer	99603 (907)235-2536	Representative Paul Seaton	Senator Gary Stevens
Strand	Laura	4255 Pleasant Way	Homer	99603 (907)235-6532	Representative Paul Seaton	Senator Gary Stevens
Stuart	Gloria	292 Mt View Dr	Homer	99603 (907)235-2898	Representative Paul Seaton	Senator Gary Stevens
Tener	Margaret	56865 Bradley	Homer	99603 (907)235-8985	Representative Paul Seaton	Senator Gary Stevens
Tolva	Mimi	PO Box 2117	Homer	99603 (907)235-8356	Representative Paul Seaton	Senator Gary Stevens
Vial	Mark	PO Box 3665	Homer	99603 (907)235-5903	Representative Paul Seaton	Senator Gary Stevens
Anderson	Susan M	PO Box 65	Hope	99605 (907)788-3311	Representative Mike Hawker	Senator Con Bunde
Hoogenboorn	Melissa	PO Box 198	Kasilof	99610 (907)260-3023	Representative Mike Chenault	Senator Thomas Wagener
Wade	Jesse S	Box 3266	Kenai	99611 (907)283-4654	Representative Kelly Wolf	Senator Thomas Wagener
Askin	Marty	PO Box 178	Kenai	99611 (907)283-3972	Representative Kelly Wolf	Senator Thomas Wagener
Askin	Victoria	PO Box 178	Kenai	99611 (907)283-3972	Representative Kelly Wolf	Senator Thomas Wagener
Chase	Lori S	PO Box 1537	Kenai	99611 (907)283-7790	Representative Kelly Wolf	Senator Thomas Wagener
Ingels	Robin	PO Box 398	Kenai	99611 (907)262-1493	Representative Kelly Wolf	Senator Thomas Wagener
Rogers	Kate	PO Box 654	Kenai	99611 (907)283-6202	Representative Kelly Wolf	Senator Thomas Wagener
Schaeffer	Laurie	545 Wortham	Kenai	99611 (907)283-9085	Representative Kelly Wolf	Senator Thomas Wagener
Dick	V. Beth	3300 Wilton White Way #A	Kouliak	99615 (907)485-6431	Representative Dan Ogg	Senator Gary Stevens
Niland	Michelle	MX45	McCarthy	99588 (907)554-4421	Representative Carl Morgan	Senator Georgianna Lincoln
Adams	Barbara	PO Box 674	Nenana	99760 (907)832-5809	Representative Carl M. Morgan, Jr	Senator Georgianna Lincoln
Brooks	Floyd	PO Box 250	Nenana	99760 (907)322-8855	Representative Carl Morgan	Senator Georgianna Lincoln
Reed	Bonnie	PO Box 4189	Nenana	99760 (907)832-5849	Representative Carl Morgan	Senator Georgianna Lincoln
Smith	Zak	PO Box 7063	Nikiski	99635 (907)776-8115	Representative Mike Chenault	Senator Thomas Wagener
Encelewski	Karen	PO Box 66	Ninilchik	99639 (907)567-3925	Representative Mike Chenault	Senator Thomas Wagener
Samuelson	Laura	PO Box 300	Nome	99762 (907)443-6630	Representative Richard Foster	Senator Donald Olson
Lloyd	Marvel	PO Box 1998	Nome	99762 (907)443-5759	Representative Pete Kott	Senator Fred Dyson
Allen	Ronald	1288 Rangeview Dr	North Pole	99705 (907)488-3965	Representative John B. Coghill, Jr	Senator Gene Theriault
Cook	Joy	1853 Kendall Ave.	North Pole	99705 (907)488-0488	Representative John B. Coghill, Jr	Senator Gene Theriault
Cook	Robert	1853 Kendall Ave.	North Pole	99705 (907)488-0488	Representative John B. Coghill, Jr	Senator Gene Theriault
Cornell	Cheryl	PO Box 71475	North Pole	99705 (907)488-5627	Representative John B. Coghill, Jr	Senator Gene Theriault
Dukes	Michael	2467 Arctic Cache Way	North Pole	99705 (907)490-3067	Representative John B. Coghill, Jr	Senator Gene Theriault

Cooper	Brandee	PO Box 15071	Fritz Creek	99603 (907)299-0312	Representative Paul Seaton	Senator Gary Stevens
Goode	Thomas	PO Box 15234	Fritz Creek	99603 (907)235-5657	Representative Paul Seaton	Senator Gary Stevens
Rutledge	Tamara	430 Beluga Ave. A	Ft. Richardson	99505 229-9943	Representative Nancy Dahlstrom	Senator Fred Dyson
Carroll	Angela	PO Box 955	Girdwood	99587 301-5874	Representative Mike Hawker	Senator Con Bunde
Drake	Lanice	PO Box 938	Girdwood	99587 783-2662	Representative Mike Hawker	Senator Con Bunde
Reed	Jay	PO Box 1	Girdwood	99587 783-0087	Representative Mike Hawker	Senator Con Bunde
Stone	Amy	PO Box 580	Girdwood	99587 783-0848	Representative Mike Hawker	Senator Con Bunde
Stone	Eber	PO Box 580	Girdwood	99587 783-0848	Representative Mike Hawker	Senator Con Bunde
Wood	Gary	PO Box 185	Healy	99743 (907)683-2667	Representative David Guttenberg	Senator Ralph Seekins
Wood	Rhea	PO Box 185	Healy	99743 (907)683-2667	Representative David Guttenberg	Senator Ralph Seekins
Lake	Kathleen A.	HC1, Box 3108	Healy	99743 (907)683-0453	Representative David Guttenberg	Senator Ralph Seekins
Wycoff	Regina	MP 25 Parks Hwy	Healy	99743 (907)683-2301	Representative David Guttenberg	Senator Ralph Seekins
Aderhold	Jim	350 Grubstakes Ave.	Horner	99603 (907)235-6540	Representative Paul Seaton	Senator Gary Stevens
Prindle-Hess	Polly	PO Box 1724	Homer	99603 (907)235-2926	Representative Paul Seaton	Senator Gary Stevens
Zatz	Daniel	PO Box 1700	Homer	99603 (907)235-4102	Representative Paul Seaton	Senator Gary Stevens
Zatz	Lisa	PO Box 1700	Homer	99603 (907)235-4102	Representative Paul Seaton	Senator Gary Stevens
Adkison	Vernon	PO Box 3785	Homer	99603 (907)235-5557	Representative Paul Seaton	Senator Gary Stevens
Autin	Jessica	PO Box 1934	Homer	99603 (907)235-5664	Representative Paul Seaton	Senator Gary Stevens
Baier	Jane	4106 Svedlund	Homer	99603 (907)235-8344	Representative Paul Seaton	Senator Gary Stevens
Barling	Gerl	PO Box 891	Homer	99603 (907)235-6068	Representative Paul Seaton	Senator Gary Stevens
Becker	Lynne	40889 Belnap Dr.	Homer	99603 (907)235-6484	Representative Paul Seaton	Senator Gary Stevens
Blahton	Renaee	3059 Kachemak Dr.	Homer	99603 (907)235-2628	Representative Paul Seaton	Senator Gary Stevens
Bloom	Kenton	1581 Jade	Homer	99603 (907)235-6600	Representative Paul Seaton	Senator Gary Stevens
Bursch	Tom	2233 Mt. Augustine	Homer	99603 (907)235-5111	Representative Paul Seaton	Senator Gary Stevens
Cavasos	Connie	PO Box 3665	Homer	99603 (907)235-5903	Representative Paul Seaton	Senator Gary Stevens
Classen	Jesse	PO Box 518	Homer	99603 (907)235-2472	Representative Paul Seaton	Senator Gary Stevens
Classen	K.	PO Box 518	Homer	99603 (907)235-2472	Representative Paul Seaton	Senator Gary Stevens
Concia	Filomena	151 W. Bayview #3	Homer	99603 (907)235-1855	Representative Paul Seaton	Senator Gary Stevens
Douglass	Iris	PO Box 2182	Homer	99603 (907)235-6291	Representative Paul Seaton	Senator Gary Stevens
Eggertsen-Golf	Lari	4525 Heidi Ct.	Homer	99603 (907)235-3950	Representative Paul Seaton	Senator Gary Stevens
Fellows	Lisa	PO Box 1065	Homer	99603 (907)235-2835	Representative Paul Seaton	Senator Gary Stevens
Fletcher	Tamara	PO Box 575	Homer	99603 (907)235-2561	Representative Paul Seaton	Senator Gary Stevens
Freeman	Asia	1849 Highland	Homer	99603 (907)235-2825	Representative Paul Seaton	Senator Gary Stevens
George	Katherine	542 Mountain View Dr.	Homer	99603 (907)235-4313	Representative Paul Seaton	Senator Gary Stevens
Gustafson	Nell	PO Box 4144	Homer	99603 (907)235-6653	Representative Paul Seaton	Senator Gary Stevens
Handrich	Pamela	36460 Full Curl Rd.	Homer	99603 (907)235-6394	Representative Paul Seaton	Senator Gary Stevens
Hibdon	Lynne	274 Lee Dr.	Homer	99603 (907)235-9324	Representative Paul Seaton	Senator Gary Stevens
Huffman	Gabriela	53200 McNeil Pt.	Homer	99603 (907)235-7091	Representative Paul Seaton	Senator Gary Stevens
James	Colleen	40732 Waterman Rd.	Homer	99603 (907)235-4313	Representative Paul Seaton	Senator Gary Stevens
Jason	Wendy	4192 Kramer Ln. #4	Homer	99603 (907)235-6844	Representative Paul Seaton	Senator Gary Stevens
Kauffman	Phyllis	PO Box 2613	Homer	99603 (907)235-2313	Representative Paul Seaton	Senator Gary Stevens
Keester	Doug	48730 Elmers Way	Homer	99603 (907)235-3675	Representative Paul Seaton	Senator Gary Stevens

Lotseich	Paula	2571 Lingston Loop	Fairbanks	99709 (907)479-8753		
Markham	Leslie	PO Box 84148	Fairbanks	99708 (907)452-2733		
Mathews	Shellie	413 Lignite Ave.	Fairbanks	99701 (907)456-4350		
McCaffery	Kerri	2441 Lawlor	Fairbanks	99709 (907)474-8551		
McCarthy	Cathy	4363 York Ave.	Fairbanks	99709 (907)479-3604		
McKee	Shawn	474 Senate Dr.	Fairbanks	99709 (907)458-7640		
McKnight	Kathleen	500 Prospectors Trl.	Fairbanks	99712 (907)474-3467		
McNeill	Ruben	PO Box 81911	Fairbanks	99708 (907)457-5574		
Miller	Sara	310 Wedgewood, #26	Fairbanks	99701 (907)457-5302		
Mohatt	Gerald	1625 Hans Way	Fairbanks	99709 (907)479-0455		
Morse	Rebecca	PO Box 74372	Fairbanks	99707		
Murphy	Gretchen	3504 Krieb Dr.	Fairbanks	99709 (907)479-8224		
Murrison	Linda	3813 Swenson	Fairbanks	99707		
Mustard	Carolyn	2564 Wecota Dr.	Fairbanks	99709 (907)479-6101		
Norcross	Brenda	3512 Rosie Circle Rd.	Fairbanks	99709 (907)479-0518		
Pain	Alice	PO Box 84345	Fairbanks	99708 (907)479-4473		
Roch	Mary	PO Box 61481	Fairbanks	99706		
S	Paula	PO Box 81836	Fairbanks	99708 (907)479-4856		
Schoenewald	Judy	PO Box 82272	Fairbanks	99708 (907)455-6586		
Shilling	Dianne R.	PO Box 10484	Fairbanks	99710 (907)490-2354		
Shilling	Rod	PO Box 72093	Fairbanks	99707 (907)490-2354		
Speck	Pia R.	PO Box 84341	Fairbanks	99709 (907)479-7860		
Stephenson	Robert O.	1837 No Way Lane	Fairbanks	99709 (907)455-6481		
Subelman	Elena	148 Nilgrub	Fairbanks	99712 (907)458-9517		
Teel	Mary Lou	1846 Esquire Ave.	Fairbanks	99709 (907)452-2248		
Throop	Pamela	159 Sacia Ave	Fairbanks	99712 (907)456-6008		
Torur	Doug	PO Box 73013	Fairbanks	99707 (907)455-7998		
Trainor	Marcia	PO Box 72263	Fairbanks	99707 (907)479-3975		
Viereck	Eleanor	1701 Red Fox	Fairbanks	99709 (907)479-2879		
Virgin	Jacque	1028 Dogwood St.	Fairbanks	99709 (907)459-1443		
Walton	Laurie J.	675 Gold Vein Rd.	Fairbanks	99712 (907)457-2131		
Weaver	Pamela	PO Box 83713	Fairbanks	99708 (907)488-4729		
Weiblen	Nicole	455 3rd Ave., #404	Fairbanks	99701 (907)452-2405		
Weimer	Allura	1616 Market St.	Fairbanks	99709 (907)457-3241		
Wheat	Roberta	PO Box 80526	Fairbanks	99708 (907)479-4067		
Williams	Jennifer	2812 Barnette St.	Fairbanks	99701 (907)457-4919		
Williams	Kathleen	802 Alice Rd.	Fairbanks	99712 (907)490-6426		
Woods	Hettie	PO Box 74163	Fairbanks	99701 (907)451-7936		
Zito	Irnia Jean	PO Box 80949	Fairbanks	99708 (907)479-2655		
Yates	Ann	PO Box 142	Fort Yukon	99740 (907)662-3261	Representative Carl Morgan	Senator Georgianna Lincoln
Callahan	Betty A.	PO Box 15073	Fritz Creek	99603 (907)235-6201	Representative Paul Seaton	Senator Gary Stevens
Callahan	John	PO Box 15073	Fritz Creek	99603 (907)235-6201	Representative Paul Seaton	Senator Gary Stevens

Benson	Linda	PO Box 10774	Fairbanks	99710 (907)479-5309
Berge	Anha	583 Long Spur	Fairbanks	99709 (907)457-1986
Beyer	L.W.	913 College Rd	Fairbanks	99701 (907)456-1211
Bogusch	Odessa	323 6th Ave.	Fairbanks	99701 (907)458-5739
Bohart	Dave	1120 Gilmore Trl.	Fairbanks	99712 (907)457-4146
Bohart	Susan	1120 Gilmore Trl.	Fairbanks	99712 (907)457-4146
Browne	Margaret	2880 Alderberry Trail	Fairbanks	99709 (907)455-9100
Canulo	Kathryn	1924 Gilmore Trail	Fairbanks	99712 (907)457-6373
Carlin	Barbara	3202 Industrial	Fairbanks	99701 (907)456-4494
Caywood	Cyrde	535 2nd Ave., #107	Fairbanks	99701 (907)456-1974
Christopher	Karen	PO Box 70188	Fairbanks	99707 (907)322-2010
Colp-Butler	Jessica	1421 Mary Ann St.	Fairbanks	99701 (907)474-4833
Corven	Elizabeth	PO Box 81245	Fairbanks	99708 (907)456-2966
Cummings	Sharon	545 Fidler Rd.	Fairbanks	99712 (907)479-3772
Dart	James	4935 Dartmouth Dr., #1	Fairbanks	99709 (907)458-8987
Delong	David	PO Box 83551	Fairbanks	99708 (907)455-6369
Delong	Debra	736 9th Ave	Fairbanks	99701 (907)451-6766
Dewey	Barbara	PO Box 80442	Fairbanks	99708 (907)479-4818
Doramus	Loemie	1696 Red Fox	Fairbanks	99709 (907)378-7188
F	Johathon	221 Penrose Lane	Fairbanks	99709 (907)457-7243
Foote	Victoria	3275 Kirgery Ct.	Fairbanks	99709 (907)479-0908
Foster	Colette	PO Box 83647	Fairbanks	99708 (907)474-0643
Garett	Mary	533 Craig Ave.	Fairbanks	99701 (907)451-7880
Gilbert-Gard	Lyn	403 Parkland Dr.	Fairbanks	99712 (907)457-1217
Grandfield	Shirley Jaquel	PO Box 10509	Fairbanks	99710 (907)488-9508
Hansen	Michael	1122 Coppet	Fairbanks	99709 (907)455-6479
Harriger	Mark	PO Box 8116	Fairbanks	99708 (907)479-5449
Harriger	Sara	PO Box 8116	Fairbanks	99708 (907)479-5449
Helferick	Molly R.	1127 20th, #4	Fairbanks	99701 (907)374-4452
Henry	Jessica	PO Box 84937	Fairbanks	99708 (907)456-4679
Henry	John	PO Box 84937	Fairbanks	99708 (907)456-4679
Hobson	Susan M.	PMB 324	Fairbanks	99709 (907)479-5212
Holland	Raelynn	122 Brigham Way	Fairbanks	99709 (907)474-3980
Houchens	Amelia	225 Pine St.	Fairbanks	99709 (907)452-7800
Huffman	Connie	PO Box 84022	Fairbanks	99708 (907)479-3444
Ihenfeld	Nancy	2390 Inclination Dr.	Fairbanks	99709 (907)455-6573
Jacobs	Laura	3805 Fenchman Rd.	Fairbanks	99709 (907)455-6950
Jones	Rebecca	1704 Marika Rd. #2	Fairbanks	99709 (907)456-7370
Kobylk	Micki E.	232 1/2 2nd St.	Fairbanks	99701 (907)479-7605
Leffingwill	Victoria	750 Quasar	Fairbanks	99712 (907)457-7644
Leonard	Mike	454 Carlton	Fairbanks	99701 (907)451-7641
Lizinger	Rebecca	1225 Third Ave	Fairbanks	99701 (907)458-7774

Hamer	Michelle	3043 Riverview Dr.	Fairbanks	99709	(907)452-2450
Hanchett	John	PO Box 10041	Fairbanks	99710	(907)488-2437
Hayes	Deborah	PO Box 82802	Fairbanks	99708	(907)456-5463
Heck	Linda	PO Box 72352	Fairbanks	99707	(907)452-3160
Hedgecock	Haley	PO Box 753124	Fairbanks	99775	(907)451-1960
Howard	Grace W	330 3rd Ave, #513	Fairbanks	99701	(907)457-5545
Howard	Shari	PO Box 10232	Fairbanks	99710	(907)488-3887
Immel	John P	3122 Riverview Dr	Fairbanks	99709	(907)456-5248
Jones-Owen	Melissa	710 Hillcrest	Fairbanks	99712	(907)457-8971
Kaynor	Carol	1760 Snowhook Tr	Fairbanks	99709	(907)455-9663
Kells	Connie	3528 International	Fairbanks	99701	(907)458-1846
Kienle	Alexandra	1515 Husky Way	Fairbanks	99709	(907)479-2342
Kinda	Craig	671 Finsbury	Fairbanks	99709	(907)456-5463
Lacey	Dave	PO Box 81765	Fairbanks	99708	(907)474-8224
Larson	Melody	PMB 243	Fairbanks	99709	(907)978-0693
Loitz	Tammy	308 Dunbar	Fairbanks	99701	(907)457-6635
Maillele	Barbara	PO Box 82632	Fairbanks	99708	(907)458-0818
McConnell	Sarah	PO Box 85262	Fairbanks	99708	
Mihm-Kunz	Lori	108 Eureka Ave.	Fairbanks	99701	(907)452-3962
Montella	Margaret	506 Sprucewood	Fairbanks	99910	(907)459-5364
Nickles	Mary Ann	215 Dunbar kAve.	Fairbanks	99701	(907)456-6074
Nunley	Leslea	2008 Perkins Dr	Fairbanks	99709	(907)479-3374
Palmer	Laura	PO Box 81766	Fairbanks	99708	(907)460-5875
Raidmae	Brooke	1620 Washington Dr, #17	Fairbanks	99709	(907)451-7377
Raimsey	Therisa	455-3rd Ave #522	Fairbanks	99701	(907)479-4790
Riche	Kathe	932 Carol Lane	Fairbanks	99712	(907)457-2996
Rocheleau	Chris	165-3rd Ave.	Fairbanks	99701	(907)347-2491
Ruppert	Anne	2352 Broadmoor Ave.	Fairbanks	99709	(907)479-4008
Shockley	Marlene	1151 Ivy Dr.	Fairbanks	99709	(907)474-9072
Spencer	Sylvia	PO Box 58099	Fairbanks	99711	(907)488-6874
Stevenson	Irene	670 Hobbit Hill Dr.	Fairbanks	99712	(907)457-7225
Sweet	Steve	1108 Galena St	Fairbanks	99709	(907)474-9589
Toby	Theresa	PO Box 73535	Fairbanks	99707	(907)457-6666
Vance	Christine M	5241 Cherokee Ave.	Fairbanks	99709	(907)479-4701
Watts	Connie	PO Box 70294	Fairbanks	99707	(907)455-9391
Wilbe	Robyn	PO Box 82745	Fairbanks	99708	(907)479-7311
Winans	Mark L.	6041 Sherman Rd.	Fairbanks	99709	(907)388-2602
Winkler	Linda	1925 Lynx Ln	Fairbanks	99709	(907)479-4337
Anderson	Terry	227 Woodridge, #25	Fairbanks	99709	(907)474-0468
Anger	Donna	1075 Red Ridge Rd	Fairbanks	99709	(907)456-6091
Armstrong	Vickie	4544 Drake St.	Fairbanks	99709	(907)474-4786
Barrett	Paul	108 Duke Way	Fairbanks	99709	(907)479-5283