



Committee: House Health and Government Operations Committee

Bill Number: House Bill 937

Title: Naturopathic Doctors – Formulary Council Membership, Formulary Content, and Scope of Practice

Date: March 3, 2020

Position: Oppose

The Maryland Affiliate of the American College of Nurse- Midwives respectfully opposes *House Bill 937 – Naturopathic Doctors – Formulary Council Membership, Formulary Content, and Scope of Practice*. We are pleased that naturopathic doctors are able to practice in Maryland. Naturopathic doctors have a broad scope of practice largely focusing on the healing power of nature, and a variable scope of prescriptive authority in states where they are licensed. Our concerns about prescriptive authority as presented in this bill are numerous.

We recognize that naturopathic doctors have training in pharmacology. However, we are unclear about the rigor, the subject matter, and the depth of this training. We understand that the prescriptive authority will be formulary based and exclude controlled substances. The bill does not specify the classes and schedules of pharmaceuticals naturopathic doctors wish to prescribe under the proposed formulary model, nor whether they plan to restrict prescriptive authority to medications derived from natural substances. Additionally this bill does not specify any parameters for collaboration with other practitioners who have a broad pharmacology knowledge base.

These criteria impact the appropriateness of granting prescriptive authority. Without clarity about these issues, we have concerns for safe prescribing practices which have the potential to adversely impact patient safety.

Thank you for the opportunity to submit testimony. If you have any questions, please contact Robyn Elliott, at relliott@policypartners.net or (443) 926-3443.