



## Maryland Naturopathic Doctors Association

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Annapolis, MD

**To:** House Health and Government Operations Committee

**Bill:** HB 867 - State Board of Physicians - Naturopathic Doctors - Prescriptive Authority and Administration

**Date:** March 4, 2025

**Position:** Favorable

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The Maryland Association of Naturopathic Doctors (MNDA) strongly supports *HB 867 - State Board of Physicians - Naturopathic Doctors - Prescriptive Authority and Administration*. The bill provides for prescriptive authority to naturopathic doctors for legend and Schedule III through V medications. The bill also provides clarifying language for the dispensing and administering of natural substances. The bill does not change the requirement that naturopathic doctors have a collaborative agreement with a physician.

### **Overview of Naturopathic Doctors and Naturopathic Medicine**

Naturopathic medicine focuses on whole patient wellness through health promotion and disease prevention. Naturopathic doctors diagnose, treat, and manage patients by addressing the root causes of illness. Naturopathic doctors provide individualized, evidence-informed therapies that balance the least harmful and most effective approaches to support optimal health in patients. There is often a misconception that naturopathic doctors do not believe in or prescribe medication. In fact, the practice of naturopathic medicine includes prescribed medication if that is the optimal form of treatment.

### **After Nearly 10 Years of Licensure, Maryland's Law about Naturopathic Doctors Should Be Updated**

In 2014, the Maryland General Assembly enacted HB 402 to establish the licensure framework for naturopathic doctors under the Board of Physicians. After nearly ten years of licensure, it is time to examine if Maryland's law should be updated. Naturopathic doctors may diagnose and treat patients

for a wide range of health conditions. However, Maryland's law prevents naturopathic doctors from prescribing medication, even though it is within their scope of practice.

House Bill 867 updates Maryland's law to recognize that prescribing medication is within the scope of practice of a naturopathic doctor. House Bill 867 reflects the education of naturopathic doctors as well as the experience of other states:

- **Maryland's Rigorous Education Requirements:** Maryland law requires naturopathic doctors to complete a 4-year graduate education program that is nationally accredited. Naturopathic medical education includes 141.5 hours of didactic pharmacological education which is then integrated into a minimum of 1,200 hours of supervised clinical education with a focus on primary and preventative care.
- **Maryland's Competency-Based Examination Requirements:** Maryland's law requires naturopathic doctors to pass Part I and II of the competency-based exam administered by the North American Board of Naturopathic Examiners. Part I is taken after completing the first two years of clinical science coursework to assess the student for entry into their clinical internship rotations throughout their third and fourth years. NPLEX Part II is completed after graduation and consists of clinical case scenarios, followed by several questions that challenge candidates to provide differential diagnoses, select appropriate diagnostic tests, prescribe safe and effective treatments, manage acute-care emergencies, and critically interpret research findings.
- **Pharmacology Competency:** The 400-question case-based NPLEX II exam requires that students describe primary actions, adverse effects, indications, contraindications, and potential interactions of pharmaceutical medicines with botanical medicines, nutritional supplements, and other drugs. They must demonstrate the ability to identify and manage polypharmacy issues, monitor and assess for therapeutic drug levels and toxicity, and identify the abuse potential of prescription and street drugs.
- **How Maryland's Law Compares to Other States:** Twenty-four states, including the District of Columbia, license naturopathic doctors. Fourteen states provide a statutory framework for naturopathic doctors to prescribe medication. Maryland's law only provides for naturopathic doctors to prescribe four medications: 1) diaphragms; 2) cervical caps; 3) oxygen; and 4) epinephrine. Otherwise, Maryland's law provides for a formulary for which all other prescribed medications are prohibited.
- **Recognizing the Strong Evidence of Safe Prescribing in Other States:** According to the Federation of Naturopathic Medicine Regulatory Authorities, most states that recognize prescribing rights for naturopathic doctors have **zero** disciplinary actions for prescribing. These states are Hawaii, Idaho, New Hampshire, New Mexico, Utah, Vermont, and Montana. There are several other states with very high numbers of naturopathic doctors that report between an average of 0.1 to 2.1 disciplinary actions a year related

to prescribing. These states are California, Oregon, Arizona, and Washington states. These rates are well below average of other prescribing professions.

### **House Bill 867 Will Increase Health Care Access for Marylanders**

House Bill 867 will significantly increase access to healthcare for Marylanders seeking treatment from a naturopathic doctor:

- **Only 63 Naturopathic Doctors Practice in Maryland Because of Prescribing Restrictions:** There are over 8,000 naturopathic doctors in the U.S. However after nearly 10-years of licensure, there are only 63 naturopathic doctors practicing in Maryland. Unless a naturopathic doctor has family ties to Maryland, they are unlikely to relocate to our state. House Bill 867 is essential to helping Maryland recruit and retain naturopathic doctors.
- **Avoiding Harmful Disruptions to Care:** Patients in the care of naturopathic doctors face harmful disruptions in care. Despite Maryland's best efforts, our healthcare system is far from seamless. When patients need to see an existing provider, they must often wait weeks to months for an appointment. Appointments with a new provider often take months. Since naturopathic doctors do not have prescribing authority, they cannot:
  - Treat conditions for which patients commonly turn to naturopathic doctors. These conditions include menopause and perimenopause, thyroid disorders, cardiometabolic disorders, and acute and chronic infections.
  - Adjust dosages of prescribed medication. Naturopathic doctors can monitor a patient's conditions, including ordering tests, but they cannot adjust medications when clinically indicated. This restriction presents a problem when patients do not have a current relationship with a prescribing provider or cannot be seen in a timely fashion.
  - Address urgent conditions which jeopardize a patient's health. Just this month, the patient of a Maryland naturopathic doctor suffered a miscarriage. The naturopathic doctor had identified that a pregnant patient was suffering from low progesterone and needed medication immediately to save the pregnancy. However, the patient was turned down by her other provider, and she suffered a miscarriage.

## **Conclusion**

We appreciate the opportunity to submit this testimony in support of House Bill 867. We request a favorable report to recognize that prescribing medication is within the scope of practice of a naturopathic doctor. If we can provide any additional information, please contact Robyn Elliott at [relliott@policypartners.net](mailto:relliott@policypartners.net) or (443) 926-3443.