



AMERICAN OSTEOPATHIC ASSOCIATION



Maryland Association of
Osteopathic Physicians

TO: Maryland State House Health and Government Operations Committee

FROM: American Osteopathic Association
Maryland Association of Osteopathic Physicians

DATE: March 03, 2025

SUBJECT: In OPPOSITION to House Bill 867

The American Osteopathic Association (AOA) and the Maryland Association of Osteopathic Physicians (MAOP) write to express our strong opposition to HB 867, which jeopardizes patient safety by inappropriately expanding the scope of practice for naturopaths while at the same time eliminating medical board oversight.

The AOA represents more than 197,000 DOs and osteopathic medical students (OMSs) nationwide. The AOA promotes public health, encourages scientific research, serves as the primary certifying body for DOs, and is the accrediting agency for osteopathic medical schools, including the newly established Meritus School of Osteopathic Medicine in Hagerstown, MD. The MAOP is a professional medical organization that represents more than 1,400 DOs and OMSs providing patient care in Maryland.

The AOA and the MAOP support the “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. While we value the contributions of all health care providers to the health care delivery system, we believe that naturopaths’ education and training – which focuses on holistic and natural therapies – lacks the comprehensive and robust requirements that physicians complete, which enables them to safely deliver the services described in this bill.

The requirements for licensure as a DO or an allopathic physician (MD) in the United States are substantially similar, and include:

- **Four years of medical school**, which includes **two years of didactic study** totaling upwards of 750 lecture/practice learning hours within the first two years, **plus two more years of clinical rotations** done in community hospitals, major medical centers and doctors’ offices.
- A **comprehensive, three-part licensing examination** series designed to test their knowledge and ability to safely deliver care to patients before they are granted a license to independently practice medicine.
- **12,000 to 16,000 hours of supervised postgraduate medical education** (“residencies”) completed over the course of **three to seven years**, during which DO and MD physicians develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.

By contrast, naturopathic education:

- **Varies by school.** There are seven naturopathic schools accredited by the Council on Naturopathic Medical Education (CNME) in the United States.
- Traditionally **focuses on holistic and nontoxic approaches** to therapy with a **strong emphasis on disease prevention and optimizing wellness.**

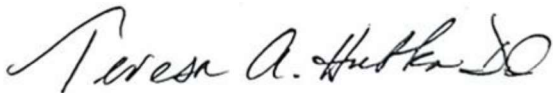
- **May not include any residency training.** While opportunities for one- to two-year residencies exist, this training is still optional and standard residency curriculum, rotations or experiences do not exist.

Despite the fact that **naturopaths complete far less education, training and testing** than physicians, this bill proposes to **remove the medical board's authority to regulate naturopathic prescribing** and **expands their prescription authority** to all Schedule III-V drugs. Further, the bill also **allows them to administer treatments via intramuscular, subcutaneous, and intravenous routes**, without physician oversight.

Physicians are required to complete extensive, standardized *and* supervised educational and training requirements before they are granted the authority to independently provide the services described in this bill. Naturopaths **have not completed** similar requirements, which serve to protect patient safety. For these reasons, the AOA and the MAOP urge you to **OPPOSE HB 867**.

Should you have any questions, please do not hesitate to contact Bre Schmidt, MPH, AOA Associate Director of State Government Affairs, at bschmidt@osteopathic.org, or Stephanie Henley, MAOP Executive Director at stephanie@marylanddo.org.

Sincerely,



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