



Request for Amendment

SB470/HB520– State Board of Physicians – Naturopathic Doctors – Scope of Practice

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We Oppose Taxpayer Funded Abortion by Naturopathic Doctors

On behalf of the Board of Directors of Maryland Right to Life and our 200,000 followers across the state, we respectfully request your amendment of SB470/HB520 to exclude lethal abortion drugs from the type of drugs that can be prescribed by a naturopathic doctor. This bill would revise the Health Occupations Article to change the scope of practice for naturopathic doctors to allow them to prescribe, provide and administer both prescription and non-prescription drugs, not otherwise in the formulary – *which could include dangerous abortion drugs*.

To ensure the safety and efficacy of abortion drugs, a pregnant woman must obtain a physical examination by a licensed Doctor of Obstetrics. That safeguard was recently removed by the reckless deregulation of abortion drugs by the FDA and the Maryland General Assembly. Medical negligence or misuse can result in severe injury, infection, miscarriage, stillbirth, disability and even death.

The state of Maryland has a duty to ensure that abortion is safe and must intervene on behalf of women and girls by adopting a protocol and standard of medical care for the use of chemical abortion drugs that must include an obstetrical examination and prescription by a licensed obstetrician.

Maryland Abortion Care Access Act

In 2022, the Maryland General Assembly repealed the final safeguard for women by enacting the Abortion Care Access Act, making it legal for non-physicians (**including any certified pharmacist**) to provide abortions and forcing taxpayers to pay to train abortion providers. The Act established the Abortion Clinical Care Training Program in the Maryland Department of Health (the Department), renamed as the Abortion and Reproductive Clinical Health Program, and established the Abortion Care Clinical Training Program Fund. In 2025, the State gave at least \$10.6 million in grants to abortion training providers.

Bill Language We Oppose

Under the FDA’s Risk Evaluation and Mitigation Strategy (REMS), abortion drug mifepristone and its generic counterpart should not be viewed as a "starter dose" (which usually implies the first of a long-term series of the same drug, like an antibiotic or a maintenance med). Instead, the FDA defines it as the **primary active agent** in a two-drug **regimen** that is ingested over a **48-hour period**.

However, states with more liberal abortion policies like Maryland, are using terms like "loading dose" as a legal workaround to the REMS, to allow those who are uncertified in the abortion pill regime, to administer abortion drugs. This bill could be interpreted to allow naturopathic doctors to prescribe or administer a “starting dose” of mifepristone or misoprostol.

The language that we oppose is as follows:

14-5F-01.

(L)(2) "Naturopathic medicine" includes: (V) PRESCRIBING OR ADMINISTERING: 1. **PRESCRIPTION DRUGS AND DEVICES THAT ARE NOT CONTROLLED DANGEROUS SUBSTANCES;** AND (VI) DISPENSING A **STARTER DOSAGE** OF A DRUG OR DEVICE DESCRIBED IN ITEM (V) OF THIS PARAGRAPH.

AND

14-5F-14.

(a) A license authorizes a licensee, consistent with naturopathic education and training and competence demonstrated by passing the naturopathic physician licensing examination, to:

(10) SUBJECT TO ITEM (11) OF THIS SUBSECTION, PRESCRIBE, DISPENSE A **STARTER DOSAGE** OF, AND ADMINISTER WITHIN THE SCOPE OF NATUROPATHIC MEDICINE A PRESCRIPTION DRUG OR DEVICE;

For the purposes of this bill as "starter dose" of a drug is defined as follows:

12-102

(2) For the purposes of paragraph (1) of this subsection, "starter dosage" means an amount of drug or device sufficient to begin therapy: (i) Of short duration of **72 hours or less; or ...**

Abortion Drugs Are Not "Safe"

Chemical abortion drugs are harmful to women's health, almost always result in the death of a fetal human being, and are often misused due to the reckless deregulation of these drugs by the Food and Drug Administration and State of Maryland. The incidence of abortion coercion and forced ingestion of abortion drugs against a woman's consent are increasing nationwide as men can now easily order and be prescribed these lethal drugs without sufficient oversight. This bill would put Maryland women at greater risk of harm.

The profit-minded abortion industry claims that chemical abortion is safe and easy. The truth is that chemical abortions are **4 (four) times more dangerous than surgical abortions**, presenting a high risk of hemorrhaging, infection, and even death. While the abortion industry falsely reports complications for only .5% of women, new reports prove that at least 11% of women experience serious complications from abortion pills. **The true risk is 22 times higher than reported.** This is willful medical negligence by the abortion industry and abortion drug manufacturers that would not be tolerated by the State in any other area of "healthcare" practice. This false reporting is meant to keep women in the dark about the true risks of abortion drugs, denying women their right to give informed consent.

Reducing the credentials of those who may perform or provide abortions, including reimbursing pharmacists who distribute abortion drugs, is increasing the number of preborn children being killed,

subjecting more women to injury and death, and straining emergency room providers who must provide emergency interventions for botched abortions as abortion drug providers who routinely deny their customers care for abortion complications. With the indiscriminate distribution of chemical abortion pills, the demand on Emergency Room personnel to deal with botched abortion complications has increased 500%, exacerbating existing medical scarcity and undermining the conscience rights of medical providers. Maryland already has the longest emergency room wait times in the nation.

Adopt Reasonable Health and Safety Standards

Chemical abortions now account for as many as 75% of all abortions. The growing reliance on chemical abortion underscores the need for a state protocol for the use of abortion drugs including informed consent specific to the efficacy, complications and abortion pill reversal therapy. Strong informed consent requirements manifest both a trust in women and a justified concern for their welfare.

Previously, the FDA required that abortion drugs be distributed only under the supervision of a qualified healthcare provider because of the drug's potential for serious complications. A physician's examination was deemed necessary to assess the duration of pregnancy, diagnose ectopic pregnancies, and provide any surgical intervention for failed chemical abortions.

While we oppose all abortion, we strongly recommend that the state of Maryland enact reasonable regulations to protect the health and safety of girls and women by adopting the previous FDA Risk Evaluation and Mitigation Strategies (REMS) safeguards that required that the distribution and use of mifepristone and misoprostol, the drugs commonly used in chemical abortions, and any generic forms of these drugs, to be under the supervision of a licensed physician because of the drugs' potential for serious complications including, but not limited to, uterine hemorrhage, viral infections, pelvic inflammatory disease, loss of fertility and death.

By authorizing naturopaths to prescribe lethal abortion drugs without examination by an obstetrician, the State will be putting women's lives at risk and promoting the mass destruction of preborn children. The inevitable harm to women includes underestimation of gestational age may result in higher likelihood of failed abortion. Undetected ectopic pregnancies may rupture leading to life-threatening hemorrhages. Rh negative women may not receive preventative treatment resulting in the body's rejection of future pregnancies. **Men can order and pick up abortion drugs from a pharmacist and administer them to women without their consent.** Catastrophic complications can occur through telabortion, and emergency care may not be readily available in remote or underserved areas. With the remote distribution of chemical abortion drugs, the demand on Emergency Room personnel to deal with abortion complications has increased 500%, increasing medical scarcity and threatening the conscience rights of medical providers. Maryland emergency rooms already have the longest wait times in the nation.

Abuse of Abortion Drugs

The state also is neglecting the fact that as much as 65% of abortions are not by choice, but by coercion. Because of the deregulation of abortion drugs, we are seeing many examples across the nation of individuals being prosecuted for coercing women into ingesting abortion drugs without their

knowledge or consent, most often resulting in miscarriage. Potential for misuse and coercion is high when there is no way to verify who is consuming the medication and whether they are doing so willingly. Sex traffickers, incestuous abusers and coercive partners all take advantage of easily available chemical abortion drugs. (See Article: <https://www.independent.co.uk/news/world/americas/massachusetts-abortion-pill-boyfriend-charged-robert-kawada-b2553243.html>)

The Public Opposes Funding for Abortions

A [2026 Marist poll](#) showed that 54% of Americans, both “pro-life” and “pro-choice” oppose the use of tax dollars to pay for a woman’s abortion. Maryland taxpayers believe that the state only uses public funds for abortions that are deemed “medically necessary” in order to save the life or health of the mother. Taxpayers do not support the use of public funds for elective abortions, which make up the vast majority of abortions committed in Maryland.

Without amendment, this bill could allow additional public funds to be used as corporate welfare for the abortion industry and abortion drug manufacturers, further subsidizing these for-profit businesses and their non-profit partners. This is in direct conflict with the will of 88% of people who prefer funding for programs that protect the lives of both mothers and children.

Subsidizing Corporate Abortion

Abortion is big business in Maryland. Maryland taxpayers subsidize the abortion industry in Maryland through direct Maryland Medicaid reimbursements to abortion providers, through various state grants and contracts, and through pass-through funding in various state programs. Health insurance carriers are required to provide reproductive health coverage to participate with the Maryland Health Choice program. Public departments and programs subsidizing abortion and abortion providers include the Maryland State Department of Education, Maryland Department of Health, Abortion Care and Reproductive Clinical Health Program, Maryland Family Planning Program, Maternal and Child Health Bureau, the Children’s Cabinet, Maryland Council on School Based Health Centers, Maryland Assembly for the Advancement of School Based Health, Community Health Resource Commission, Maryland Children’s Health Program (MCHP) and Maryland Stem Cell Research Fund.

Public Funding through Maryland Medicaid – The *Maryland Medical Assistance Program* and the *Maryland Children’s Health Program* (MCHP) are the two primary programs used for publicly funded reimbursements to abortion providers in Maryland.

According to the Maryland Department of Legislative Services in their *Analysis of the FY2025 Maryland Executive Budget*, Maryland taxpayers, through the Maryland Medical Assistance Program, are being forced to pay for *elective* abortions. In 2023, taxpayers spent at least \$7.9 million for 12,727 abortions, with **less than 11 of those abortions due to rape, incest or to save the life of the mother.**

Medical Assistance Expenditures on Abortion Language attached to the Medicaid budget since 1979 authorized the use of State funds to pay for abortions under specific circumstances. Specifically, a physician or surgeon was required to certify that, based on his or her professional opinion, the

procedure is medically necessary. Similar language was attached to the appropriation for **MCHP** since its advent in fiscal 1999. However, this language was repealed in 2022.

Funding restrictions are constitutional

The Supreme Court of the United States, in *Dobbs v. Jackson Women’s Health* (2022), overturned *Roe v. Wade* (1973) and held that there is no right to abortion found in the Constitution of the United States. As early as 1980 the Supreme Court affirmed in *Harris v. McRae*, that *Roe* had created a limitation on government, not a government funding entitlement. The Court ruled that the government may distinguish between abortion and other procedures in funding decisions -- noting that “no other procedure involves the purposeful termination of a potential life”, and held that there is “no limitation on the authority of a State to make a value judgment favoring childbirth over abortion, and to implement that judgment by the allocation of public funds.”

The Maryland General Assembly must put patient safety before abortion politics and profits. For these reasons, we respectfully urge you to amend or issue an unfavorable report on this bill in order to protect women’s health against substandard medical care, dangerous abortion drugs and abortion coercion through forced ingestion.

We appeal to you to prioritize the state’s interest in human life, healthy pregnancy outcomes and to restore to all people, born and preborn, our natural and Constitutional rights to life, liberty, freedom of speech and religion.