

February 1, 2026

The Honorable Heather Bagnall, Chair
Delegate Bonnie Cullison, Vice Chair
Health Committee
240 Taylor House Office Building
Annapolis, MD 21401

RE: Support for HB520 State Board of Physicians - Naturopathic Doctors - Scope of Practice, Renewals, and Professional Liability Insurance

Dear Chair Bagnall and Members of the Committee,

My name is Natalie Gustafson, PharmD, and I am a licensed pharmacist and independent pharmacy owner in Oregon. I have worked closely with naturopathic doctors (NDs) who hold prescribing rights in Oregon for more than seventeen years. During this time, I have filled hundreds of thousands of prescriptions written by thousands of naturopathic doctors - both from Oregon and from other states with similar authority. In addition, I chair an advisory committee on prescribing for the Oregon Board of Naturopathic Medicine and have been a member for the past fifteen years. Please note that all statements in this letter reflect my personal experience and professional judgment, and not those of the Council or the Board.

One of the most common concerns raised when discussing ND prescriptive authority is patient safety. My experience in Oregon demonstrates that this concern is unfounded. Naturopathic doctors in multiple states have maintained an excellent safety record for many years, including with controlled substances. As a pharmacist, I have not observed any meaningful difference in safety or clinical appropriateness between prescriptions written by naturopathic doctors and those written by other licensed prescribers.

Most NDs tend to be conservative in their prescribing habits as their education emphasizes a natural, integrative approach to care. Another important dimension of patient safety is access to care. In Oregon, NDs have helped address practitioner shortages, especially in primary care and rural settings. By being able to prescribe, NDs ensure that their patients receive timely and complete care - without the unnecessary delays that occur when multiple providers must coordinate a single prescription.

Over the years, I have spoken with thousands of patients who have shared how much they value the care they receive from their naturopathic doctors. Supporting naturopathic doctors prescribing rights has simplified and improved patient care. Many have told me their health outcomes and quality of life improved dramatically thanks to treatments prescribed by their ND—care that would not have been possible without prescribing

authority.

From my extensive experience, I strongly support HB520, in line with their scope of practice and training. I am happy to be a resource if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'N. Gustafson', with a long horizontal flourish extending to the right.

Natalie Gustafson, PharmD
Oregon Registered Pharmacist