



JAMES L. MADARA, MD
EXECUTIVE VICE PRESIDENT, CEO

ama-assn.org
t (312) 464-5000

February 2, 2021

The Honorable David Wilson
Chair
Senate Health and Social Services
Alaska State Legislature
State Capitol Room 121
Juneau, AK 99801

Re: Opposition to Alaska Senate Bill 38

Dear Chair Wilson:

On behalf of the American Medical Association (AMA) and our physician and medical student members, I write to express our **strong opposition to Alaska Senate Bill (S.B.) 38**. This bill would inappropriately authorize naturopaths to prescribe medications and perform surgery, both of which are beyond naturopaths' education and training. S.B. 38 would also allow naturopaths, who have no medical education, to refer to themselves as a "physician." The AMA believes the title "physician" should be reserved for those who have a Doctor of Medicine, Doctor of Osteopathic Medicine, or a recognized equivalent physician degree and who would be eligible for an Accreditation Council for Graduate Medical Education (ACGME) residency. Allowing naturopaths to use the term "physician" will only serve to confuse and mislead the public. Taken together, these three elements in S.B. 38 would set Alaska on a dangerous path by allowing naturopaths to prescribe medications and perform surgery without the education and training to do so and then mislead the public of their qualifications by allowing them to use the term "physician." **For all these reasons we strongly encourage you to oppose S.B. 38.**

A close review of naturopathic education and training reveals several shortcomings that should give the Alaska Senate pause when conferring independent authority on naturopaths to prescribe and dispense drugs. Naturopathy – by its very definition is a natural modality in which **neither surgical nor medical agents are used**. This is based on naturopathic belief that the human body has an innate healing ability. As such, naturopathic education and training pays almost no attention to pharmacological treatment or education. For example, naturopathic doctoral programs accredited by the Council on Naturopathic Medical Education require only a few credits in pharmacologic intervention during naturopathic training. Because naturopathic training does not include the education or training to provide sufficient experience in prescribing medication, by virtue of the accreditation of naturopathic schools and the underlying philosophies of naturopathy, this bill's authorization of naturopath prescribing of prescription drugs threatens the health and safety of Alaska's patients.

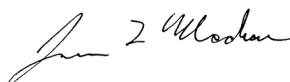
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Even more alarming is the language in S.B. 38 that would allow naturopaths to perform surgery. As discussed above, “naturopathy” by definition does not include performing surgery. As such, naturopathic programs do not include the comprehensive education or training necessary to perform surgery. The AMA defines surgery as the practice of medicine which is performed for the purpose of structurally altering the human body by the incision or destruction of tissues. Surgery is also the diagnostic or therapeutic treatment of conditions or disease processes by any instruments causing localized alteration or transposition of live human tissue which include lasers, ultrasound, ionizing radiation, scalpels, probes, and needles. The tissue can be cut, burned, vaporized, frozen, sutured, probed, or manipulated by closed reductions for major dislocations or fractures, or otherwise altered by mechanical, thermal, light-based, electromagnetic, or chemical means. Similarly, the injection of diagnostic or therapeutic substances into body cavities, internal organs, joints, sensory organs, and the central nervous system is also to be considered surgery. **Surgery is not something to be taken lightly, as there is no such thing as a minor surgical procedure, which is why the AMA believes only those licensed as a Doctor of Medicine (M.D.) or Doctor of Osteopathic Medicine (D.O.) who meet appropriate professional standards are qualified to perform surgery. Allowing naturopaths to perform surgery would pose a serious threat to the safety of patients in Alaska.**

Finally, the AMA strongly opposes the language in S.B. 38 that would allow naturopaths to use the term “physician” in their title. The AMA believes the term “physician” should only be used by those who have a Doctor of Medicine, Doctor of Osteopathic Medicine, or a recognized equivalent physician degree and who would be eligible for an ACGME residency. **Patients overwhelmingly agree. According to a recent AMA survey of adults nationwide, 88 percent agreed with the statement, “only licensed medical doctors or doctors of osteopathic medicine should be able to use the title of ‘physician.’”** Expanding the definition of physician to include naturopaths is both misleading and confusing to patients. As patients are asked to navigate an increasing number of health care professionals in the health care system, all with varying degrees of education and training, it is more important than ever that clear titles are used. Allowing naturopaths to use the title “physician” is both inappropriate and does not provide the transparency patients need to navigate the health care system. This is even more concerning when coupled with the other expansions that would be permitted in S.B. 38.

Based on all the reasons given above, we strongly urge you to put the safety of patients first and oppose S.B. 38. Thank you for the opportunity to provide these comments. If you have any questions, please contact Kimberly Horvath, JD, Senior Legislative Attorney, Advocacy Resource Center, at kimberly.horvath@ama-assn.org.

Sincerely,



James L. Madara, MD

cc: Pam Ventgen, Executive Director, Alaska State Medical Association
Senator Scott Kawasaki