

Date: September 1, 2016

To: The Honorable Andy Biggs, President, Arizona State Senate  
The Honorable David Gowan, Speaker, Arizona House of Representatives  
From: Arizona Naturopathic Medical Association

### **Sunrise Application on behalf of the Arizona Naturopathic Medical Association**

The Arizona Naturopathic Medical Association submits this application pursuant to A.R. S. Section 32-3104 and Section 32-3106 relating to the scope of practice of the profession of naturopathic medicine.

The Arizona Naturopathic Medical Association petitions the Committees of Reference for approval in the modification of the definition of drug to allow intravenous administration of antibiotics.

#### **Introduction**

According to Arizona statute 32-1501(28), the *practice of naturopathic medicine* is a medical system of diagnosing and treating diseases, injuries, ailments, infirmities and other conditions of the human mind and body including by natural means, drugless methods, drugs, nonsurgical methods, devices, physical, electrical, hygienic and sanitary measures and all forms of physical agents and modalities.<sup>1</sup> Naturopathic physicians are primary health care practitioners, whose techniques include modern and traditional treatments and scientific and empirical methods.

A licensed naturopathic physician (ND) attends a four-year, graduate level naturopathic medical school and is educated in all of the same sciences as an MD or DO. In addition to a standard medical curriculum, students also study complementary medical approaches with a strong emphasis on disease prevention and optimizing wellness.

In order to obtain licensure in Arizona, naturopathic physicians are required to graduate from a nationally accredited, four-year school of naturopathic medicine and to pass rigorous nation board exams.<sup>2</sup> In addition, applicants for licensure must have satisfactorily completed an approved internship, preceptorship, or clinical training program in naturopathic medicine.<sup>3</sup> Once the applicant fulfills all of the above requirements he or she is eligible for licensure with the state of Arizona Naturopathic Physicians Medical Board (the board), which oversees the practice of naturopathic physicians. The board currently licenses 839 naturopathic physicians.

Current law prevents naturopathic physicians from prescribing four groups of medications; these four groups are antipsychotics, chemotherapeutics, Class II substances (except morphine and hydrocodone) and intravenous legend drugs. With those exceptions, naturopathic physicians are permitted to prescribe *all legend (prescription) drugs*, and are permitted the use of intravenous vitamins, minerals and nutrients, chelation therapy and emergency drugs.<sup>4</sup>

#### Scope Expansion Request

**The Arizona Naturopathic Medical Association (AzNMA) is requesting through the sunrise process an increase in the scope of practice for naturopathic physicians to permit them the use of intravenous antibiotics to treat their patients. This will allow more access to medications that are needed by some**

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<sup>1</sup> A.R.S. 32-1501(28)

<sup>2</sup> A.R.S. 32-1525

<sup>3</sup> A.R.S. 32-1522(2)

<sup>4</sup> ARS 32-1501 (15)

patients who, because of a chronic illness or other condition, don't benefit from the usage of oral antibiotics to treat infections, thus necessitating the use of intravenous antibiotics in some instances.

**1. A definition of the problem and why a change in scope of practice is necessary including the extent to which consumers need and will benefit from practitioners with this scope of practice.**

The current statutory definition of drug for naturopathic physicians excludes intravenous (IV) administration of antibiotics.<sup>5</sup> **The request being made in this application is to allow for the intravenous administration of antibiotics by naturopathic physicians.** Allowing the intravenous administration of antibiotics will enhance the health of certain patients and allow the practice of naturopathic medicine to provide appropriate treatment to individuals who have conditions that require direct administration of antibiotics to treat specific illnesses and diseases. These patients of naturopathic physicians would receive more effective treatment by allowing antibiotics to be administered intravenously and would reduce their need to see multiple primary care physicians for antibiotic treatment.

**Summary of the problem for naturopathic physicians and their patients**

IV antibiotics are used for different reasons and in certain situations where it's deemed more beneficial than oral antibiotic use. They can be used to treat infections that are resistant to oral antibiotics. Additionally, this type of administration is necessary for patients with certain conditions that make oral administration of antibiotics ineffective and not an option.

In some cases, patients with compromised intestinal tracts can benefit from the use of IV antibiotics to treat conditions that may arise. Frequently, patients with conditions such as ulcerative colitis and crohn's disease cannot tolerate oral antibiotics. Because of intestinal damage, some people can't absorb oral antibiotics. When someone with one of these conditions gets sick, IV antibiotic administration may be the preferred alternative.

Expanding the naturopathic physician's scope to include IV antibiotics will also allow for naturopathic physicians to order IV antibiotics for patients to be administered by a provider from a home health care agency.

Patients of naturopathic physicians who need antibiotics for an infection for something as simple as a UTI or strep throat and who cannot absorb oral antibiotics shouldn't be required to see a different physician when they get sick and need to be treated.

**2. The extent to which the public can be confident that qualified practitioners are competent including: (a) Evidence that the profession's regulatory board has functioned adequately in protecting the public. (b) Whether effective quality assurance standards exist in the health profession, such as legal requirements associated with specific programs that define or endorse standards or a code of ethics. (c) Evidence that state approved educational programs provide or are willing to provide core curriculum adequate to prepare practitioners at the proposed level**

The public can be confident that naturopathic physicians have the education and qualifications to administer intravenous antibiotics and that the profession is adequately regulated. A naturopathic physician's education and other requirements for licensure in the state of Arizona are described in detail below, as well as the regulatory board functions.

Naturopathic physicians are currently prescribing antibiotics. They possess the training in pharmacology to administer them safely through oral administration. Naturopathic physicians are also trained in the use of IVs. If the COR found it necessary, this proposal could include an additional specific educational requirement for naturopathic physicians who wish to prescribe with this expanded scope.

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<sup>5</sup> Ibid.

## **Naturopathic Medical School**

In order to obtain licensure in Arizona, naturopathic physicians are required to graduate from a four-year school of naturopathic medicine that is accredited by the Council on Naturopathic Medical Education (CNME). The U.S. Secretary of Education recognizes the CNME as the accrediting agency for naturopathic medical programs.<sup>6</sup> To be considered for admission to a naturopathic medical school, applicants must hold a baccalaureate degree with specific pre-requisites including credits in biology, chemistry, psychology, English, and the humanities.

A naturopathic physician's education includes basic science and clinical diagnostic coursework, two years of clinical internship at both private medical clinics and medical school health centers, and three separate courses in clinical pharmacology, which include instruction in pharmacokinetics and pharmacodynamics of all classes of drugs.

## **National Board Exams - National Naturopathic Physicians Licensing Examination (NPLEX)**

Applicants for naturopathic medical licensure must pass a rigorous nation board exam called the National Naturopathic Physicians Licensing Examination (NPLEX) administered by the North American Board of Naturopathic Examiners (NABNE). The NPLEX exam consists of two parts in three subject areas: Part I – Biomedical Science Examination, Part II – Core Clinical Science Examination, and Part II – Clinical Elective Examinations.<sup>7</sup> In order to be eligible to take the NPLEX Part I – Biomedical Science Examination, applicants must have completed all biomedical science coursework in his or her naturopathic medical program, including anatomy, physiology, biochemistry & genetics, microbiology & immunology, and pathology, and all required labs.<sup>8</sup> After completing Part I, applicants are then able to take parts II and III.

## **Naturopathic Physicians Medical Board**

In addition to graduation from an approved naturopathic medical school and passage of the NPLEX, applicants for licensure in Arizona must have satisfactorily completed an approved internship, preceptorship, or clinical training program in naturopathic medicine.<sup>9</sup> Once the applicant fulfills all of the above requirements, he or she is eligible for licensure with the Arizona Naturopathic Physicians Medical Board (the board), which oversees the practice of naturopathic physicians.

Naturopathic Physicians are regulated by the Naturopathic Physicians Medical Board. The Naturopathic Physicians Medical Board hears complaints and disciplines naturopathic physicians as necessary, similar to all other medical regulatory boards.

Licensed naturopathic physicians are required to follow standards of practice in regards to prescribing and administering medications in the same manner as other medical professionals. If anyone feels that a naturopathic physician did not follow correct procedures in treating and counseling a patient or endangered a patient, they could report that physician to the regulatory board where the case would be investigated and proper disciplinary action would be taken if there was inappropriate conduct.

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<sup>6</sup> "The Database of Accredited Postsecondary Institutions and Programs," US Department of Education, Accessed August 25<sup>th</sup>, 2016, <http://ope.ed.gov/accreditation/Search.aspx>

<sup>7</sup> "Frequently Asked Questions," North American Board of Naturopathic Examiners, Accessed August 25<sup>th</sup>, 2016, <https://www.nabne.org/home/f-a-q/>

<sup>8</sup> "Eligibility to Take The NPLEX Part I – Biomedical Science Examination," North American Board of Naturopathic Examiners, Accessed August 25<sup>th</sup>, 2016, <https://www.nabne.org/home/nplex-part-i-biomedical-science-examination/>

<sup>9</sup> ARS 32-1522

Naturopathic physicians are held to the same standards as all Arizona health care professionals by Arizona Revised Statutes Title 32 Chapter 32 Health Professionals. The board regulates licensees in professional, moral, ethical, and legal issues for the state of Arizona.<sup>10</sup>

### **Continuing Medical Education Requirements**

Every calendar year naturopathic physicians are required to complete 30 credit hours of continuing medical education activities. 10 of these credit hours are required to be in pharmacology as it relates to the diagnosis, treatment, or prevention of disease.<sup>11</sup>

**3. The extent to which an increase in the scope of practice may harm the public including the extent to which an increased scope of practice will restrict entry into practice and whether the proposed legislation requires registered, certified or licensed practitioners in other jurisdictions who migrate to this state to qualify in the same manner as state applicants for registration, certification and licensure if the other jurisdiction has substantially equivalent requirements for registration, certification or licensure as those in this state.**

Because of the rigor of a naturopathic physician's medical training, the increase in the scope of practice will not present any harm to the public. If the committee found it necessary, this proposal could include an additional specific educational requirement for naturopathic physicians to complete who wish to prescribe with this expanded scope.

The proposed increase in scope of practice will not restrict entry into practice in the state of Arizona. All qualified candidates for licensure in Arizona from other jurisdictions who migrate to this state are subject to the same rigorous medical training.

**4. The cost to this state and to the general public of implementing the proposed increase in scope of practice.**

There is no cost to the state or to the general public for this change in scope. Any associated state cost would be placed on the regulated community through the Naturopathic Physicians Board of Medical Examiners

Naturopathic Physicians are the preferred provider of primary medical care for many in Arizona. The approval of the sunrise application will allow the patients of naturopathic physicians the health benefits associated with administering intravenous antibiotics. Patients will be able to receive this treatment without having to find an additional primary care provider to provide the treatment.

On behalf of the Arizona Naturopathic Medical Association, we respectfully submit this sunrise application and request your consideration.

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<sup>10</sup> A.R.S. 32-1554

<sup>11</sup> A.A.C. R4-18-205