



TO: Members of the Maine House Committee on Health Coverage, Insurance, and Financial Services

FROM: American Osteopathic Association

DATE: March 25, 2026

SUBJECT: OPPOSITION to ME LD 2242

The American Osteopathic Association (AOA) writes today to express our strong opposition to LD 2242, which resolves to provide a legislative review of provisionally adopted 02-502 C.M.R. Ch. 6, thereby changing the formulary for naturopaths and allowing them to administer intravenous (IV) therapies. **The AOA shares the concerns of the Maine Osteopathic Association that LD 2242 would jeopardize the health and safety of Maine’s residents by authorizing naturopaths to perform medical services that fall outside of the scope of their education and training.**

As a medical professional association representing more than 207,000 osteopathic physicians (DOs) and osteopathic medical students (OMSs) nationwide – including the more than 1,200 DOs and OMSs in Maine – the AOA works to promote evidence-based policies and sound public health practices that advance the overall health and well-being of patients across the country.

The AOA supports 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 alone, **plus two more years of clinical rotations** done in community hospitals, major medical centers and doctors’ offices.
- **A comprehensive, three-part licensing examination** 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** (“residency”) over the course of four years where they develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.
- Many physicians also choose to sit for **certifying board examinations** administered by the AOA or the American Board of Medical Specialties (ABMS), which serve as a mark of excellence in their chosen specialty.

In contrast, the education that naturopaths complete:

- **Varies by school.** There are five naturopathic schools accredited by the Council on Naturopathic Medical Education (CNME) in the United States; however, the CNME’s accreditation handbook outlines no cohesive pharmacology curriculum, nor does it provide competency requirements or training hour requirements to protect patient safety¹.

¹ See <https://cnme.org/wp-content/uploads/2025/09/CNME-Handbook-of-Accreditation-September-2025-Edition.pdf>



- Traditionally **focuses on holistic and nontoxic approaches** to health and healing, with a **strong emphasis on disease prevention and optimizing wellness**.
- **Does not include any required post-graduate (“residency”) training**. While opportunities for one- to two-year residencies exist, this training is still optional and standardized residency curriculum, rotations and/or experiences do not exist.
- Culminates in a **single exam created by other naturopaths**.

In every metric, naturopaths complete far less education, training and testing than DOs and MDs, and the training that they do complete focuses on natural interventions such as optimizing nutrition, utilizing botanical medicine, and lifestyle counseling. By the time they graduate, naturopaths only complete 1,200 hours of clinical training, of which only 850 hours are required to be in direct patient care² – **less than one-tenth of the clinical training physicians undergo. Further, the training that naturopaths complete is unstandardized and lacks a robust pharmacology curriculum, resulting in significant variations in levels of competency and the ability to address adverse events**. Despite this, LD 2242 would allow them to intravenously administer various therapies that carry serious risks, including infection, severe allergic reactions (anaphylaxis), and emergent drug interactions.

In addition to the above concerns, this bill runs counter to collaborative efforts that are currently underway between the state’s Board of Nursing, Board of Licensure in Medicine, and the Board of Osteopathic Licensure to regulate IV therapy administration in medspas and aesthetic businesses following reports of patient harm. Joint rulemaking by these three boards intends to align rules for medspa IV administration with those for “health care services provided in other health care settings,” to ensure that providers meet basic competency requirements for patient safety. Section 1(4) of the proposed rule states “the diagnosis of a patient’s condition and subsequent recommendation to administer IV therapy . . . can be performed only by licensed physicians, physician associates, and advanced practice registered nurses,” which conflicts with the provisions of this bill.

The AOA urges you to oppose LD 2242 to ensure that only qualified healthcare professionals are eligible to administer IV therapy, thereby protecting the health and safety of Maine patients. Should you need any additional information, please contact Raine Richards, JD, Vice President of State and International Affairs at richards@osteopathic.org.

Sincerely,

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President, AOA

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² Ibid.