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Dear Chairs Mathieson and Bailey and members of the HCIFS committee -

I write as a physician and osteopath residing in Kennebec County—where I also own and operate an independent direct primary and specialty care clinic—in strong support for the Resolve to Review Major Substantive Rule Related to Formulary for Naturopathic Doctors, as written by the Board of Complementary Health Care Providers. The proposed rules represent a contemporary correction to an antiquated naturopathic formulary that is both timely and overdue. It will allow Naturopathic Doctors (NDs) to practice in a manner reflective of their depth of training and profound competency in treating complex multisystem disease, while also removing barriers to patient care in an inordinately fractured and indescribably fallow healthcare landscape.

Aside from my private practice, I am also the medical director of a Maine state opioid health home, providing medication assisted treatment for substance use disorders and adult psychiatric medication management for its patients. I am the authorizing prescriber signatory to the Maine medication administration program prescriber approved protocol for Albertson's Companies statewide. I am certified by both the American Board of Family Practitioners and the American Osteopathic Board of Neuromusculoskeletal Medicine, and have maintained an active and unrestricted license in Maine for nearly a decade of both hospital employment and private practice. Unlike many of the commenters writing in opposition to the proposed rule, however, I also have direct knowledge of naturopathic training and practices in Maine. I have worked and collaborated with NDs for my entire independent career, learning from and alongside them as peers and mentors; I have attended naturopathic conferences and can directly compare their continuing education to that of my allopathic and osteopathic colleagues; I have consulted with and for them on direct patient care and can reflect precisely on their detailed medical reasoning and clinical acumen. They are in most ways our equals and in many ways our betters.

Naturopathic medical training has at its root a very significant overlap with allopathic and osteopathic training in terms of pharmacology, pathology, physiology, microbiology, and other core medical training parameters. While their surgical training is limited to office-based procedures, they are not exactly itching to

get into the operating theatre and their medical training is at least commensurate. Additionally, their multisystem-focused, holistic, and preventive care training is far superior. While our own profession struggles to incorporate the basics of nutrition, often misunderstands or contradicts itself about evidence-based supplementation, and distrusts herbalism of any sort while vainly attempting to force an understanding of it piecemeal onto our boards, NDs regularly and seamlessly combine all of these into medically-sound comprehensive treatment protocols that include appropriate prescribing. This is why patients with complex multisystem disease—who are far too often gaslit by a medical establishment that cannot provide them answers—come into naturopathic care to find healing. That so many of my respected colleagues feel anxious about naturopathic practice demonstrates clearly that they either don't know or don't understand what it entails, and it pains me greatly to find little in the published objections of the MMA, MOA, et al. that amounts to anything more than fear-mongering or weaponized ignorance.

Upon initial licensure in 1996, a sunrise review concerning the education and competency of Naturopathic Doctors in Maine determined that NDs were qualified to prescribe all non-controlled legend drugs. This initial formulary recommendation was peer reviewed and evidenced, yet before implementation it was redacted both by lobby and by fiat to a proscriptive shell of what was intended. NDs have been handicapped ever since by a confusing and poorly-defined formulary of inclusion that has no mechanism to keep up with medical advancement; in the 30 years since licensure was enacted, the formulary subcommittee specified in the licensing statute never has been convened, and efforts to clarify the formulary through the licensing board have been fruitless. This finally changed in 2025 with the unanimous passage of LD1128 by the HCIFS committee, which directed the formulary subcommittee to convene in order to “modernize” the Maine ND scope of practice. The proposed rule changes have been vetted and approved by the pharmaceutical board and NDs' own licensing board, and have received broad support from stakeholders in a public hearing. The rules as drafted reflect the board's thorough understanding of naturopathic education, training, and practice and the profession's excellent safety record in Maine.

NDs complete rigorous didactic and clinical training in pharmacology, including assessment through the NPLEX examination. In Maine, NDs are further required to complete a supervisory year before independent practice, resulting in a minimum of two years of supervised clinical experience including their final year of medical school. NDs are conservative in their prescribing by both nature and training. The profession is self-regulating, as are other professions granted broad prescribing rights. Implicit to any formulary is a level of trust in the practitioner to prescribe within their competency and experience. Maine NDs have maintained this trust: in over 30 years of prescribing medications including insulin and IV therapies, there have been no disciplinary infractions related to prescribing. Given the education, examination, and supervised clinical training required of naturopathic doctors, these formulary updates are not only appropriate, but just.

Maine's Naturopathic Doctors are ready and able to assist with alleviating the current healthcare shortage. I strongly urge you to support the rules as written. Please feel free to contact the Maine Association of Naturopathic Doctors (info@mand.org) for questions or clarifications.

Respectfully,

A handwritten signature in black ink, appearing to read 'J McCue', with a stylized flourish at the end.

Joseph McCue, DO, FDM-IC