

## Testimony in Support of LD 1128: An Act to Modernize the Formulary for Naturopathic Doctors

April 3, 2025

Madame Chair Senator Bailey and honorable members of the Joint Standing Committee on Health Coverage, Insurance and Financial Services,

My name is Nicole Egenberger and I have been a naturopathic doctor for 22 years. I live in Hope and practice in Camden. I've taught a residency program for naturopathic doctors and more recently taught medical residents at the Maine-Dartmouth Family Residency Program here in Augusta.

I am here today in support of LD 1128 because our formulary is in need of modernization: It has not been updated in 29 years, lacks clarity, and is unfortunately not aligned with current standards of care for common medical conditions.

To give you an example, our formulary allows us to prescribe insulin, which is a medication used to treat type 1 diabetes and more advanced type 2 diabetes. Unfortunately, we are not able to prescribe medications like metformin that are the standard of care at the initial stages of this disease. While we would use nutrition and lifestyle changes to improve blood sugar balance, patients often need management with medication, at least initially, to lower dangerously high blood sugar levels. Essentially, our hands are tied in trying to address one of the most common conditions facing adults today.

Naturopathic doctors commonly treat women in menopause whose symptoms are extremely disruptive to work and family life. For these women, we can prescribe estrogen and progesterone, but do not have access to testosterone, a pharmaceutical that can be an important part of their care. As you might know, women in menopause are seriously underserved in Maine, with many women driving over two hours to Portland to access care. Modernizing the formulary to include testosterone enables us to provide comprehensive menopause care in rural communities.

Administering substances before diagnostic testing is an important part of diagnosing many common conditions, like small intestine bacterial overgrowth or reactive hypoglycemia, a low-blood-sugar condition. Currently, we have to refer patients out for an additional consultation to have a simple test run.

**Our formulary lacks clarity.** You will receive submitted written testimony from pharmacists explaining their difficulty understanding what medications are part of our formulary. Pharmacists have had to approach our regulatory board many times for clarification, which takes up board resources and leads to delays in patient care.

Public health and safety is an important consideration, particularly given that 74% of Americans take dietary supplements and, according to the CDC, 25% of people over the age of 60 are taking 4 or more nutritional supplements a day. Many of these patients are self-prescribing and not being advised on how their supplements might interact with their medications.

**Realignment with current standards of care.** I'd like you to imagine that you've had a pretty serious injury and you've been prescribed aspirin to prevent blood clots, along with several other medications. You aren't tolerating aspirin, so your doctor takes you off of it. You read about nattokinase as an alternative. You ask your doctor about it, but they refuse to comment. I recently had this happen to one of my patients. In situations like this, when patients can't access experts who have training in this area, they are left guessing about whether or not they should take a particular nutritional supplement. Naturopathic doctors are uniquely trained in drug-nutrient and drug-herb interactions. Modernizing our formulary enables us to seamlessly manage medications and nutritional supplements while preventing dangerous interactions — this is a critical service for patients who want integrative care.

I'd like to touch on the safety record of naturopathic doctors as prescribers in the state of Maine. We've had prescriptive authority for thyroid medications, antibiotics, hormone replacement therapy, and insulin for 29 years. It's also important to note that many NDs in Maine focus on complex conditions like Lyme disease and long COVID. These patients are generally on many medications and we navigate that safely. Over the years, we have demonstrated that we are safe prescribers. We've had no disciplinary action carried out against an ND for errors in prescribing.

The formulary modernization LD 1128 proposes is one that is similar to the naturopathic formulary in place for the past 14 years in New Hampshire. In that time, there have been no disciplinary actions taken against NDs for prescribing practices. (Page 19 of your packets attests to these facts in the letter by the Federation of Naturopathic Regulatory Authorities).

In summary, our formulary needs modernization to align with current standards of care. Naturopathic doctors have demonstrated that they have prescribed safely for the past 29 years. With a modernized formulary, we can offer Mainers the ability to access integrative care safely and effectively. Please allow us to provide comprehensive integrative care for Mainers by voting "ought to pass" on LD 1128.

Sincerely,

A handwritten signature in black ink that reads "Nicole Egenberger ND". The signature is written in a cursive, flowing style.

Nicole Egenberger, ND