

Cayford, Edna

From: Dr. Katy Morrison <info@midcoasthealthcollective.com>
Sent: Tuesday, March 24, 2026 3:39 PM
To: Cayford, Edna
Subject: Support to Major Substantive rules provisionally adopted by the complementary healthcare providers - LD2242
Attachments: Morrison_Written_Testimony_HCIFS.docx

This message originates from outside the Maine Legislature.

Hello Ms. Cayford,

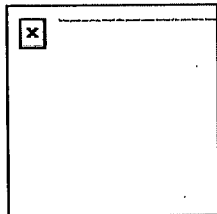
Attached is my written testimony in support of LD2242.

Thank you for your time and attention,

Sincerely,

Katy Morrison

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Dr. Katy Morrison, ND LAc
Naturopathic Doctor | Acupuncturist | Founder
Website

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Testimony – March 24, 2026

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

I am writing in support of the Resolve to Review Major Substantive Rule Related to Formulary for Naturopathic Doctors, as written by the Board of Complementary Health Care Providers. I live in Knox County and practice as a Naturopathic Doctor in Rockland. I also serve as Vice President of the Maine Association of Naturopathic Doctors.

The proposed rules represent a reasonable and long overdue modernization of the naturopathic formulary. But I want to be specific about what “modernization” means in practice. It means patients getting the care they need, when they need it, from the provider they already trust.

There are over 34,000 Mainers currently under the care of a naturopathic doctor. In 2025, MAND surveyed our members about how the current formulary impacts patient care. 59% of members responded, and the results were striking: 22% of patients experienced a delay in care because their ND could not prescribe a needed medication, with some practices reporting delays for up to 75% of their patients. A third of patients had to see another provider just to have medications adjusted, adding redundant visits, time off work, and costs to an already overtaxed healthcare system. Over 91% of NDs reported diagnosing acute conditions requiring pharmaceutical management but being unable to provide comprehensive care because essential medications were not part of the formulary. Those situations generally result in a referral to urgent care. And nearly 83% of NDs reported difficulty prescribing because pharmacists found the current formulary unclear.

These are not abstract numbers. I see this in my own practice regularly, across multiple drug classes.

I had a patient present with an acute viral condition requiring a time-sensitive antiviral. I diagnosed the condition promptly and knew the standard of care: antiviral therapy is most effective when initiated within the first 24 to 48 hours. Under the current formulary, I could not prescribe the medication. I referred the patient out, but they could not get an appointment with another provider quickly enough. The treatment window closed. The patient’s condition worsened, their suffering was prolonged, and the outcome was worse than it needed to be. I have patients with blood pressure readings high enough to require prompt treatment but not high enough to warrant emergent care. They need timely medication changes, but I cannot prescribe antihypertensives. These patients are left in a clinical gray zone: not sick enough for the ER, but unable to access the care they need in a safe timeframe. In at least one case, a patient who did not have an active relationship with a primary care provider in the area had no other option, and I had to send them to the emergency room simply to get a blood pressure medication adjusted.

I had an uninsured patient with severe allergies that were significantly affecting her daily life who needed a leukotriene inhibitor. I had to refer her to an ENT specialist, costing her hundreds of extra dollars out of pocket and prolonging her suffering for a medication I was fully trained to prescribe.

None of these were complex clinical scenarios. They were straightforward diagnoses with well-established treatments that I was trained to manage but not permitted to prescribe.

Naturopathic Doctors have been licensed in Maine since 1996. A task force report concerning the education and competency of Naturopathic Doctors in Maine conducted at the time of licensure determined that NDs were qualified to prescribe all non-controlled legend drugs. Due to lobbying opposition, that recommended formulary was never enacted. NDs have since been limited by a poorly defined formulary of inclusion that is confusing to pharmacists, fellow healthcare practitioners, patients, and NDs themselves. In the 30 years since, the formulary subcommittee specified in our licensing statute was never convened. Multiple efforts to clarify the formulary through the licensing board were fruitless.

LD1128, passed unanimously by the HCIFS committee in 2025, directed the formulary subcommittee to convene in order to modernize the Maine ND scope of practice. The proposed rule changes have been approved by a subcommittee of our regulatory board (comprised of an MD, an NP, and NDs), have been vetted and approved by the pharmaceutical board, and have received broad support from stakeholders in a public hearing.

Specifically, I support the proposed rules because they:

- Modernize the formulary of medications NDs may prescribe, including antihypertensives, asthma medications, antivirals, and antibiotics, creating clarity for practitioners, pharmacists, and collaborating providers
- Authorize effective use of IV therapy, allowing NDs to administer nutrients and medications via IV
- Clarify that NDs may order advanced imaging, including CT and MRI with contrast

NDs are conservative prescribers. In over 30 years of prescribing medications including insulin and IV therapies, Maine NDs have had zero disciplinary infractions related to prescribing. The profession is self-regulating, as are other professions granted broad prescribing rights, including MDs, NPs, and PAs. Nearly 96% of NDs believe their patients would be more compliant with essential medications if their ND were able to prescribe and manage those medications directly.

Maine's naturopathic doctors are ready and able to assist with alleviating the current healthcare shortage. These rules would allow us to do what we are already trained to do: provide timely, safe, competent care to our patients. I 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,

Dr. Katy Morrison, ND, LAc
Vice President, Maine Association of Naturopathic Doctors
Midcoast Health Collective, Rockland, Maine