

Cayford, Edna

From: Dr. Sarah Paton, ND <office@drsarahpaton.com>
Sent: Tuesday, March 24, 2026 2:40 PM
To: Cayford, Edna
Subject: Support for Major Substantive rules provisionally adopted by the complementary healthcare providers - LD2242
Attachments: Letter of Support to Major Substantive rules provisionally adopted by the complementary healthcare providers - LD2242 - Dr Sarah Paton, ND.pdf

This message originates from outside the Maine Legislature.

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

I am writing in strong 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 am a naturopathic doctor with nearly two decades of clinical experience, and I currently care for patients both in Maine and in Arizona, where naturopathic physicians have a broader, more clearly defined prescribing scope. This contrast has made something very clear to me: when naturopathic doctors are allowed to practice to the full extent of their training, patient care becomes more seamless, timely, and effective.

In my 19 years practicing in Maine, I have regularly seen patients who need a simple medication but cannot access it in a timely way. Primary care visits can take weeks to months, and new patient waitlists often extend beyond a year.

Many of these patients reach out after moving to Maine, simply trying to continue a prescription that has already been safely prescribed. They are stable and doing well—they just need continuity. Too often, I have to turn them away. As a result, patients are left without care, forced to ration medications, or pushed into higher-cost settings for issues that should be managed routinely.

I have also had to refer patients out of state to access IV therapies for conditions such as tick-borne illness, autoimmune disease, and supportive cancer care—services that fall within naturopathic training but are not clearly accessible under Maine's current framework. This adds unnecessary cost, travel, and burden to patients who are already navigating complex health challenges.

In contrast, in Arizona, where I have broader prescribing authority, I am able to assess, treat, and follow through within one continuous relationship. Patients receive care more quickly, avoid unnecessary referrals, and experience more efficient, coordinated care.

The proposed rules represent a thoughtful and long-overdue modernization of the naturopathic formulary. They bring clarity where there has long been confusion—for patients, pharmacists, and providers alike—and allow naturopathic doctors to practice in alignment with our training and clinical responsibility.

Naturopathic doctors have been licensed in Maine since 1996. At that time, a sunrise review determined that NDs were qualified to prescribe all non-controlled legend drugs. However, due to external pressures, that recommendation was never fully implemented, leaving Maine with a fragmented and outdated formulary that has created ongoing confusion and unnecessary barriers to care.

The current proposed rules are the result of a rigorous and collaborative process. They have been developed and approved by a subcommittee including an MD, an NP, and NDs, reviewed by the Board of Pharmacy, and supported through public input. They reflect a careful, evidence-based understanding of naturopathic education and practice.

These updates will:

- Modernize the formulary and provide long-needed clarity
- Expand access to commonly used medications such as antihypertensives, asthma treatments, antivirals, and antibiotics
- Support appropriate use of IV therapies
- Clarify ordering of advanced imaging such as CT and MRI with contrast

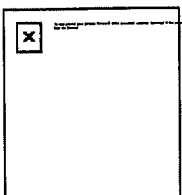
Naturopathic doctors undergo extensive training in pharmacology and clinical medicine, including rigorous board examinations. In Maine, this is further strengthened by a required supervisory period before independent practice. Importantly, our profession has demonstrated an exceptional safety record: in over 30 years, there have been no disciplinary infractions related to prescribing.

At a time when patients are facing long wait times, limited access to care, and rising costs, these changes are not only reasonable—they are necessary. Naturopathic doctors are well-positioned to help fill critical gaps in the healthcare system, but only if we are allowed to practice to the level we were trained.

I urge you to support these rules as written.

Respectfully,
Dr. Sarah Paton

PS: Also attached is this statement on letterhead for download, thank you.



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