

Cayford, Edna

From: Scott Mulliken <drnulliken@protonmail.com>
Sent: Tuesday, March 24, 2026 10:22 AM
To: Cayford, Edna
Subject: Support to the Maj Substantive rules provisionally adopted by the complementary healthcare providers

This message originates from outside the Maine Legislature.

Testimony of Dr. Mulliken, Naturopathic Doctor

In Support of Resolve to Review Major Substantive Rule Related to Formulary for Naturopathic Doctors

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

My name is Dr. Mulliken, and I am a Naturopathic Doctor who has been in clinical practice since 2002. I have treated thousands of patients from Downeast Maine to the Canadian border and throughout southern Maine. Naturopathic medicine serves patients across the lifespan, from childbirth to the management of complex conditions such as tick-borne illnesses and autoimmune disease. However, current licensing restrictions limit our ability to manage certain common and appropriate aspects of care.

I am writing in support of the Resolve to Review Major Substantive Rule Related to the Formulary for Naturopathic Doctors, as developed by the Board of Complementary Health Care Providers.

These proposed rules represent a long-overdue and practical modernization of the naturopathic formulary. More importantly, they remove unnecessary barriers that currently delay care and complicate treatment for patients in an already strained healthcare system.

In my daily practice, I see the consequences of these limitations firsthand. Recently, I was required to refer a patient back to a cardiologist for standard antihypertensive medications following a myocardial infarction. Although this patient had been discharged to my care as their primary care provider, these medications fall outside the current naturopathic formulary. This resulted in unnecessary fragmentation of care, additional appointments, and delays in treatment—even though the clinical need was clear and the medications themselves are standard of care.

This is not an isolated issue—it is a pattern. Patients are forced into inefficient and disjointed care pathways not because of clinical complexity, but because of outdated regulatory constraints.

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 lobbying opposition, that recommendation was not fully implemented. Instead, we have been operating for nearly three decades under a vague and restrictive formulary that creates confusion not only for NDs, but also for pharmacists, patients, and other healthcare providers.

Compounding this issue, the formulary subcommittee required by statute was never convened. Multiple attempts over the years to clarify or improve the formulary through the licensing board were unsuccessful. As a result, Maine patients have been receiving care within an outdated framework that no longer reflects current training, standards, or healthcare needs.

LD1128, passed unanimously by this committee in 2025, was an important step forward. It directed the appropriate stakeholders to finally address and modernize the naturopathic scope of practice. The rules now before you are the result of that process. They have been developed and approved by a subcommittee that includes an MD, an NP, and NDs, reviewed by the Board of Pharmacy, and supported by stakeholders through public hearing.

These rules are thoughtful, measured, and appropriate.

Specifically, they:

- Modernize the naturopathic formulary, creating clarity for practitioners, pharmacists, and collaborating providers
- Allow for the appropriate use of IV therapies, including nutrients and medications
- Clarify the ability of NDs to order advanced imaging such as CT and MRI with contrast

These updates align with the education and training of naturopathic doctors. NDs complete rigorous coursework in pharmacology and clinical medicine, pass national board examinations (NPLEX), and in Maine, complete a supervised year prior to independent practice—resulting in at least two years of direct, supervised clinical experience.

Equally important, naturopathic doctors have demonstrated a strong safety record. We are conservative prescribers by training and philosophy. In over 30 years of prescribing in Maine—including the use of insulin and IV therapies—there have been no disciplinary actions related to prescribing. That is a record of responsible, measured care.

At a time when Maine is facing a significant healthcare shortage, it is both practical and necessary to allow trained providers to practice to the full extent of their education and competency. These rules do not expand naturopathic medicine beyond its training—they simply bring regulation into alignment with it.

I urge you to support these rules as written.

Thank you for your time and consideration. Please feel free to contact the Maine Association of Naturopathic Doctors for further information.

Respectfully,
Scott P. Mulliken, ND