

Cayford, Edna

From: Dr. Yanez <director@aanmc.org>
Sent: Tuesday, March 24, 2026 12:04 AM
To: Cayford, Edna
Subject: Support to the Maj Substantive rules provisionally adopted by the complementary healthcare providers
Attachments: AANMC Support to the Maj Substantive Rules Provisions-March 23 2026.pdf
Follow Up Flag: Follow up
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Health Coverage, Insurance and Financial Services Committee

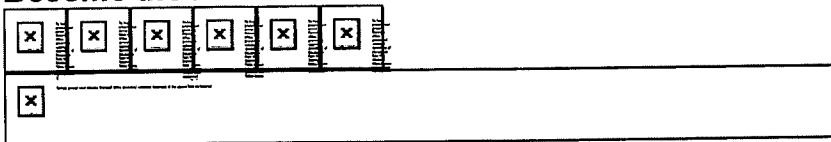
Dear Ms. Edna Cayford,

Please find the following letter of support from the Association of Accredited Naturopathic Medical Colleges.

Respectfully,
Dr. JoAnn Yanez

--
JoAnn Yánez, ND, MPH, CAE
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Association of Accredited Naturopathic Medical Colleges (AANMC)
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March 23, 2026

Maine Legislature - Health Coverage, Insurance and Financial Services Committee

Re: Support to the Maj Substantive rules provisionally adopted by the complementary healthcare providers

Dear Ms. Edna Cayford and Members of the Committee:

On behalf of the **Association of Accredited Naturopathic Medical Colleges (AANMC)**, we write in strong support of the Maine Board of Naturopathic Doctors' proposed rules related to prescriptive authority. AANMC represents the accredited institutions responsible for educating naturopathic physicians across North America and works closely with accrediting, regulatory, and academic partners to educate stakeholders regarding the quality and consistency of naturopathic medical education.

We appreciate the importance of patient safety and share the Legislature's interest in ensuring that any expansion of prescriptive authority is grounded in appropriate education, training, and oversight. However, several assertions raised in opposition mischaracterize both the structure and rigor of naturopathic medical education, particularly as it relates to pharmacology.

Naturopathic medical education includes robust and standardized pharmacology training.

All programs accredited by the Council on Naturopathic Medical Education (CNME)—recognized by the U.S. Department of Education—are required to provide comprehensive instruction in pharmacology, pharmacognosy, clinical therapeutics, and patient safety. While CNME standards are competency-based rather than prescriptively hour-based, this reflects modern accreditation practices across health professions, which prioritize demonstrated clinical competence over fixed seat-time requirements. Further, graduates must satisfy licensing examination requirements and state scope requirements for prescriptive authority.

Across accredited programs, students receive extensive training in:

- Pharmacologic mechanisms of action
- Drug–drug and drug–nutrient interactions
- Adverse event recognition and management
- Clinical decision-making related to prescribing
- Patient monitoring and safety protocols

This training is integrated throughout both didactic and supervised clinical education, where students apply pharmacologic knowledge in real-world patient care settings under faculty oversight.

Variation in curricular structure does not equate to lack of standardization.

Opposition letters point to differences in how pharmacology is presented across programs. This is not unique to naturopathic medical education. For example, accreditation standards for medical schools (LCME)



similarly do not prescribe a fixed number of pharmacology hours, and there is well-documented variation across institutions in how pharmacology is taught. What is consistent across professions is the expectation that graduates meet defined competencies for safe and effective clinical practice.

CNME-accredited programs meet these expectations, and graduates must also pass national board examinations (NPLEX) that include pharmacology and clinical decision-making components before entering practice in regulated jurisdictions.

Prescriptive authority is tied to licensure, regulation, and ongoing oversight.

In jurisdictions where naturopathic doctors are licensed with prescriptive authority, that authority is defined in statute and rule, and is subject to:

- Scope limitations
- Continuing education requirements
- Board oversight and discipline
- Collaboration and referral expectations where appropriate

Maine's proposed rules reflect this same regulatory framework and are consistent with approaches already implemented in other states.

Patient safety is strengthened—not compromised—by clear, regulated authority.

Providing a defined, regulated pathway for prescriptive authority ensures that care is delivered within a structured and accountable system. It is preferable to ambiguity, which can create inconsistency and risk. Naturopathic doctors are trained specifically in integrative care, including the safe use of both natural and pharmaceutical therapies, and are well-positioned to manage the types of interactions cited in opposition testimony.

Finally, we would note that naturopathic medicine is an established and growing profession with accredited educational programs, national licensing examinations, and licensure in multiple jurisdictions. The proposed rules in Maine represent a continuation of this evolution and alignment with contemporary healthcare delivery.

For these reasons, AANMC respectfully urges your support of the Maine Board's rulemaking.

Thank you for your consideration.

Sincerely,

Dr. JoAnn Yáñez, ND, MPH, CAE
Executive Director
Association of Accredited Naturopathic Medical Colleges