

## Cayford, Edna

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**From:** Dr. Alison R. Maloof, N.D. <hello@atlasnaturopathic.com>  
**Sent:** Tuesday, March 24, 2026 7:06 PM  
**To:** Cayford, Edna  
**Subject:** Support to Major Substantive rules provisionally adopted by the complementary healthcare providers - LD2242  
**Attachments:** LD2242 Written Testimony\_Maloof.pdf

**This message originates from outside the Maine Legislature.**

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

My name is Alison Maloof, and I am a Naturopathic Doctor practicing in **Knox County District 1**. I have been licensed and practicing in both Maine and Vermont. 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.

The proposed rules represent a long-overdue modernization of the naturopathic formulary. They would allow Naturopathic Doctors in Maine to practice in accordance with our training and competency and remove barriers to patient care in an increasingly strained healthcare landscape.

I want to share one example from my practice that illustrates the real consequences of these limitations: I have a male patient with hypertension whose former primary care provider was no longer practicing in Maine. He was unable to establish care with a new primary care office, and over time his blood pressure became dangerously elevated. The only way he could receive treatment for his hypertension was through the emergency room. This delay in care could have been avoided if Naturopathic Doctors in Maine were able to fully use our prescribing training, as we are able to in Vermont.

Currently, I am limited in Maine in ways that I am not in Vermont, where Naturopathic Doctors have a prescribing scope equivalent to medical doctors for many years. These limitations prevent me from fully using my training to help patients, particularly those in rural areas facing long wait times and provider shortages. As a Naturopathic Doctor, I am a thoroughly educated and conservative prescriber, grounded in the naturopathic philosophy of treating root causes. I focus first on the foundations of health—exercise, nutrition, and lifestyle—and use medications thoughtfully when clinically indicated.

Naturopathic Doctors have been licensed in Maine since 1996. A sunrise review at the time of licensure confirmed that NDs are qualified to prescribe all non-controlled legend drugs, but due to lobbying opposition, a full formulary was never enacted. Since then, the formulary has remained poorly defined, causing confusion among pharmacists, patients, and even healthcare practitioners. Multiple efforts to clarify the formulary have not resolved these issues.

LD 1128, passed unanimously by the HCIFS Committee in 2025, directed the formulary subcommittee to convene to “modernize” the Maine ND scope of practice. The proposed rule changes have been approved by a

subcommittee of our regulatory board—including an MD, an NP, and NDs—vetted by the pharmaceutical board, and received broad support in a public hearing. These rules reflect a thorough understanding of naturopathic training, education, and safety record.

Specifically, I support the proposed rules because they:

- **Modernize the formulary**, creating clarity for practitioners, pharmacists, and collaborating providers
- **Authorize the 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

These updates are appropriate given the rigorous education, examination, and supervised clinical training required of NDs. In Maine, NDs complete a supervisory year before independent practice, resulting in at least two years of supervised clinical experience including their final year of medical school. Over 30 years of prescribing medications—including insulin and IV therapies—Maine NDs have had **no disciplinary infractions related to prescribing**. To my knowledge, this is also true of NDs in Vermont, where the prescribing scope is broader and includes controlled substances.

Maine Naturopathic Doctors are ready and able to help alleviate the healthcare shortage, particularly in rural areas where patients face delays and barriers to care. I urge you to support the proposed rules as written. Please feel free to contact the Maine Association of Naturopathic Doctors at [info@mand.org](mailto:info@mand.org) for questions or clarifications.

With appreciation,

**Alison Maloof, ND**

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Dr. Maloof, N.D. and the Atlas Naturopathic Team

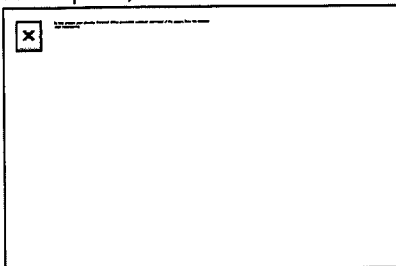
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**Alison Maloof, ND**