

Date: February 4, 2021
Bill: House Bill 219 - Naturopathic Doctors - Formulary Council Membership, Formulary Content, and Scope of Practice
Committee: House Health and Government Operations Committee
The Honorable Shane Pendergrass, Chair
Position: Unfavorable

The Maryland Academy of Nutrition and Dietetics (MAND), is an organization representing approximately 1,200 licensed dietitians and nutritionists, dietetic interns, and students within the state of Maryland.

House Bill 219 “This bill expands the types of prescription drugs and devices that must be included on the formulary for naturopathic doctors to include any other prescription drugs and devices recommended by the Naturopathic Doctors Formulary Council and approved by the State Board of Physicians (MBP). The bill expands what a licensed naturopath is authorized to do to include (1) prescribing, dispensing, and administering prescription drugs listed in the formulary and specified medical foods by the most appropriate route of administration as recommended by the council and approved by MBP and (2) dispensing, ordering, or administering natural medicines, dietary supplements, and nonprescription drugs that use any route of administration as recommended by the council and approved by MBP.”

House Bill 219 includes language regarding “medical foods” and defines the term in such a broad way that as it would encompass any food or component of specialized and medically formulated diets. This is especially concerning since this could cause confusion with Medical Nutrition Therapy services provided by licensed dietitian and nutritionists. Additionally, several types of “medical foods” are meant for patients that have inborn errors of metabolism or severe pre-existing conditions. If these “medical foods”, which the bill never defines specifically, are used off label or with someone with difficult pre-existing conditions it could be dangerous for the patient. Medical foods and dietary supplements can have negative interactions with prescription and over the counter medications.

For the reasons expressed above we ask for an unfavorable report on HB219. MAND stands ready as a resource on this issue. Thank you for your consideration of our comments.

Dr. Glenda L. Lindsey , Dr. PH, MS, RDN, LDN
Public Policy Coordinator
Public Policy Panel

Helene Fletcher MS, RDN, LDN
MAND President

For more information, please contact glendalindsey@msn.com