

### Responses to Survey - Board of Alternative Health Care

Total responses: 13 (of which 1 out of state)

<b>Highest Compliment</b>	<i>Ability to monitor on behalf of licensees</i> - 4 <i>Ability to keep profession from criticism because of bad actors</i> - 2 <i>Other:</i> - Ability to monitor the profession in order to protect the public. Licensing boards exist to protect public safety. -- Service and communications from the boards/personnel has always been excellent.				<i>Ability to streamline Continuing Ed</i> - 1 <i>None</i> - 4
<b>Biggest Complaint</b>	<i>Licensing fees too high</i> - 4 <i>Licensing renewal timelines too strict</i> -	<i>Lack of Information</i> - 3	<i>Board's response to unlicensed practice</i> - <i>Regulations too strict</i> - 1 <i>None</i> - 4	<i>Other:</i> -- Board changing rules, and interpreting rules differently for different people. -- Board has no power to make needed changes in law to keep up with changing standards of care. --The licensing procedure is very tedious and time consuming, with little explanation or guidance through the process. There are not timely responses to emails or questions.	
<b>Other reasons the board is important:</b> Accessibility is as a central point of organization and administration for members of the public as well as other professional entities to access vital information about the practices and the practitioners. -- The board is necessary to help regulate midwifery practice and licensure; and helps produce quality midwives. -- As licensed naturopathic physicians we need a board familiar with our practice of medicine. -- Keeps the profession accountable and current. -- I believe it's very important that if you are going to say you are a Dr, Midwife, acupuncturist..... that the community knows there is something behind that shingle. -- The licensing board monitors all licensees to ensure they are following scope of practice guidelines, continuing education requirements are met, and preserving public safety from individuals claiming to have medical training, Without the licensing board, anyone can claim to provide medical care, irregardless of training, experience or continuing education. -- The alternative health board allows for naturopaths to have a fuller voice and to be self-regulated rather than be regulated by medical doctors. This is not a criticism of medical doctors, they just have a different perspective and they have their own self-interests to look out for.					
<i>Public Health</i> - 2	<i>Public Welfare</i> - 1	<i>Public Safety</i> -	<i>None of these-</i>	<i>All or combination</i> - 9	
<b>Scope of Practice:</b>	<i>Too Narrow</i> - 4	<i>Too Broad</i> - 1		<i>Just Right</i> - 5	
<b>Problems with own BA or other professions' scope of practice</b> - None with own profession = 8 Yes. Board of Massage Therapy - 1 -- <b>Comment regarding too broad a scope:</b> I believe the scope of practice for midwives is unclear. The way it is worded for midwives it could be saying that a Doula is practicing midwifery. A midwife is a medical professional, not someone who just helps a mom with her birth. That is what sets a licensed midwife apart from an untrained, unschooled "lay midwife". -- <b>Comments regarding too narrow a scope:</b> -- There are a few things that would be helpful to midwives: being able to acquire and administer Rhogam, antibiotics for group beta strep positive clients, and cytotec; and the ability to administer IV fluids. - Licensed Midwives are required to submit statistics and paperwork on our clients that is required of other health professionals caring providing maternity care. -- Largely the scope for naturopaths in Montana is appropriate and well managed. The one place that I feel naturopaths could play a role in Montana is the use of medical cannabis. We are trained in primary care medicine with a focus on natural remedies including broad training in botanical medicine. We are ideal candidates to recommend and manage the use of medical cannabis in Montana for those patients that need and want to access this medicine. -- <b>Comments regarding just right scope:</b> -- The original statutes and the rules and regulations promulgated since have been congruent with the scope of practice and practice standards fundamental to naturopathic medicine as taught in accredited medical schools. -- I am able to practice consistent with the principles of my profession and education. -- I am allowed to practice any of the modalities I learned in medical school.					

**What laws/regulations have caused the most problems?** None =

Lag time while waiting to be approved to move from level to level in apprenticeship. Can't complete levels II and III simultaneously -- When training as an apprentice, [I found] the requirements were very vague. You never know if your schooling or way you are going about getting the required births are going to qualify After you are done, you present the information to the board and then the decision is made if the births qualified or not. The money and time spent on getting those births could be wasted if the board chooses not to allow you to use them. One requirement is even after being a 3rd level apprentice, you still are not allowed to do a prenatal unsupervised. A prenatal should be learned very well by this time and with supervisors so hard to find it is just an inconvenience to the supervisor. As the levels go up, the supervision requirements should go down. It's very hard to find a supervisor in this state. There needs to be more not fewer options for supervision. As a midwife we are not allowed to give a rho-gam shot to a RH Neg mother Postpartum. This is within our training and scope of care. -- The process by which apprentices advance through the "levels" is ridiculous. I've been licensed and have practiced in many other states in the West and I've never encountered as bureaucratic policies as in the Montana regs. I have midwifery students in rural areas contacting me about what to do because they cannot meet the requirements in their home communities. -- I have no problem with a law that regulates Midwives. Such laws are important for many reasons. I have serious issues with portions of law that are outdated, obsolete, and hinder the ability of women and their families to obtain safe, affordable and competent care from the health care provider of their choice. The Board should have the authority to make changes in the scope of practice and regulations that govern midwives and naturopaths, in order to keep in line with changing standards of care. The law is 20 years old and the only way to modify it would be to go back to the legislature, which would open up the entire law for attack.

**Consumer complaint filed?**

No = 5

Yes = 5 Board was effective = 4. Comments: I have on occasion through the years asked the Board of Alternative Health Care to address unlicensable practitioners who have mistakenly set up a business in the state. This has not happened in at least 10 years, thanks to the effectiveness of our law and of the staff responsible for responding to protect the public from unlicensable practitioners. -- [Complained against] person stating the practice of naturopathic medicine who was not a licensed professional. -- [Complained against] a massage therapist claiming to be a doctor of natural medicine. She was not a doctor of natural medicine. She was practicing outside her scope of license.

**Nonlicensee comments**

Saying Board of Alternative Health Care:  
Necessary for Public Health - 191 , Public Safety - 126, Public Welfare - 127. Some respondents marked all or a combination.