



March 14, 2017

The Honorable Della Au Belatti
Chairwoman
Hawaii State House Committee on Health
Hawaii State Capitol
Room 402
415 South Beretania Street
Honolulu, Hawaii 96813

Dear Chairwoman Belatti:

The American Osteopathic Association (AOA) and the Hawaii Association of Osteopathic Physicians and Surgeons (HAOPS) are writing to urge you to oppose SB 223. This bill would expand the scope of practice for naturopaths to allow them to prescribe controlled substances without requiring them to attain a level of competency equivalent to a physician. The bill fails to provide any increases in education, training or competency demonstration requirements, and controlled substance prescribing is outside of the competencies of naturopathic education, which focuses on alternative and natural therapies.

The AOA represents nearly 130,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs/osteopathic medicine can be found at www.osteopathic.org. HAOPS is a professional medical organization that represents over 300 DOs providing patient care in Hawaii.

The AOA and HAOPS support the “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. While we value the contributions of all health care providers to the health care delivery system, we believe any expansion of naturopaths’ authority to provide services to patients without appropriate oversight should be directly related to additional education, training and competency demonstration requirements. Allowing naturopaths to prescribe controlled substances, without reference to additional requirements or supervision by a physician, may ultimately be detrimental to the health and safety of patients in the state of Hawaii. Naturopathic education and training lacks the comprehensive and robust requirements needed to safely provide patients with a full range of unsupervised primary care services.

Osteopathic medical education includes:

- **Four years of medical school**, which includes two years of didactic study totaling upwards of **750 lecture/practice learning hours** just within the first two years, plus two more years of clinical rotations done in community hospitals, major medical centers and doctors' offices.
- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.
- **Strenuous continuing education requirements** for AOA board certified physicians, who participate in Osteopathic Continuous Certification. This process includes lifelong learning and continuous education, cognitive assessment and practice performance and assessment in order to ensure that board certified DOs maintain currency and demonstrate competency in their specialty area.

Naturopathic education:

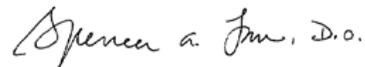
- **Varies by school**, there are seven naturopathic schools accredited by the Council on Naturopathic Medical Education (CNME) in the United States.
- **May not include residency training.** While opportunities are now available for graduates of naturopathic schools to complete a one or two year residency, **this training is still optional.** In addition, **standard requirements for naturopathic residency curriculum, rotations or experiences do not exist.**
- In terms of program content, the **CNME does not provide specific requirements, instead stating that naturopathic residents receive 35 hours a year of didactic instruction**, and "participate in scholarly activities that promote a spirit of inquiry, scholarship, and critical thinking such as discussions, rounds, study clubs, presentations, conferences, and local, regional or national professional associations and scientific societies."

Controlled substances are regulated by the federal government due to their high potential for misuse. In order to protect the public's health and safety, health professionals' scope of practice must be based on their level of training, education, experience and examination. **We urge you to protect the safety of Hawaii's patients by opposing SB 223.** Should you need any additional information, please feel free to contact Nick Schilligo, MS, Associate Vice President, State Government Affairs at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



Boyd R. Buser, DO
President, AOA



Spencer Lau, DO
President, HAOPS

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