



February 8, 2017

The Honorable Rosalyn H. Baker
Chairwoman
Hawaii State Senate Committee on Commerce, Consumer Protection, and Health
Hawaii State Capitol
Room 230
415 South Beretania Street
Honolulu, HI 96813

Dear Chairwoman Baker:

The American Osteopathic Association (AOA) and the Hawaii Association of Osteopathic Physicians and Surgeons (HAOPS) are writing to urge you to reconsider your support for 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 physicians. 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. We believe that this expansion in naturopaths' scope of practice is improper, and that health professionals' scope of practice must be based on their level of training, education, experience and examination.

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 or surgeon, 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 physicians complete four years of osteopathic medical school, which includes two years of didactic study and two years of clinical rotations. Clinical rotations in the third and fourth years

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are done in community hospitals, major medical centers and doctors' offices. This is followed by three to seven years of postgraduate medical education, i.e., residencies, where DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions. Physicians have both extensive medical education and comprehensive training that prepare them to understand medical treatment of disease, complex case management and safe prescribing practices.

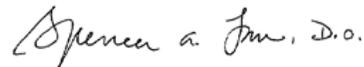
Naturopathic educational curriculum varies by school. There are seven naturopathic programs accredited by the Council on Naturopathic Medical Education (CNME) in the United States. It was only in 2005 that the CNME implemented an approval process for naturopathic residency programs. While opportunities 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." This level of education, training and certification is not sufficient to prescribe controlled substances, which are regulated by the federal government due to their potential for misuse.

To protect the public's health and safety, health professionals' scope of practice and titles must be based on their level of training, education, experience and examination. **We urge you to protect the safety of Hawaii's patients by reconsidering your support for 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
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