



TO: Members of the Hawaii State Senate Committee on Commerce, Consumer Protection, and Health

FROM: Hawaii Association of Osteopathic Physicians and Surgeons
American Osteopathic Association

DATE: February 5, 2018

SUBJECT: Senate Bill 2299

The American Osteopathic Association (AOA) and the Hawaii Association of Osteopathic Physicians and Surgeons (HAOPS) are writing in opposition to SB 2299. This bill would expand the scope of practice for naturopaths to allow them to prescribe testosterone, a controlled substance which increases the risk of heart problems in men, without requiring them to attain a level of competency equivalent to a physician. Physicians receive comprehensive education and training to allow them to properly evaluate the risks and benefits of prescribing testosterone, but controlled substance prescribing falls outside of the competencies of naturopathic education, which focuses on alternative and natural therapies.¹ We believe that expansion of naturopaths' scope of practice in this manner is imprudent, and that health professionals' scope of practice must be based on their level of training, education, experience and examination.

The AOA represents 137,000 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.

¹ <https://www.health.harvard.edu/mens-health/is-testosterone-therapy-safe-take-a-breath-before-you-take-the-plunge>.

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 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.

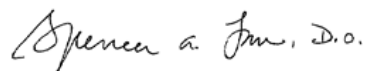
Naturopathic educational curriculum varies by school. There are seven naturopathic programs accredited by the Council on Naturopathic Medical Education (CNME) in the United States. It was only in 2005 that the CNME implemented an approval process for naturopathic residency programs. While opportunities 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 appreciate your consideration of our concerns regarding SB 2299.** Should you need any additional information, please feel free to contact Raine Richards, JD, Director of Public Policy at richards@osteopathic.org or (312)-202-8199.

Sincerely,



Mark A. Baker, DO
President, AOA



Spencer Lau, DO
President, HAOPS

CC: William S. Mayo, DO, President-elect, AOA
Joseph M. Yasso, Jr., DO, Chair, Department of Governmental Affairs, AOA
Thomas L. Ely, DO, Chair, Bureau of State Government Affairs, AOA
Adrienne White-Faines, MPA, Chief Executive Officer, AOA
David Pugach, JD, Senior Vice President, Public Policy, AOA
Raine Richards, JD, Director, State Government Affairs, AOA
Samyuktha Gumidyal, MPH, Affiliate Executive, HAOPS