



February 22, 2017

The Honorable Jill N. Tokuda  
Chairwoman  
Hawaii State Senate Ways and Means Committee  
Hawaii State Capitol  
Room 207  
415 South Beretania Street  
Honolulu, HI 96813

Dear Chairwoman Tokuda:

**The American Osteopathic Association (AOA) and the Hawaii Association of Osteopathic Physicians and Surgeons (HAOPS) are writing to urge you to oppose SB 823.** This bill would require insurers to recognize naturopaths as primary care providers and pay them the same rate as fully-trained and licensed physicians. The AOA and HAOPS oppose forcing insurers to recognize naturopaths as primary care providers, because of the potential to remove physician (DO/MD) involvement from patients' comprehensive care delivery. We believe that the safety of patients can be endangered by health practitioners with a scope of practice that is not based upon education, training and competency demonstration requirements. Because of this, physicians working with other members of the health care team, should lead patient care and be involved in their comprehensive health care decisions.

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](http://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. The proposed scope of practice expansion for naturopaths would force insurers to treat naturopaths as primary care providers, removing physicians from their comprehensive care decisions. 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 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.

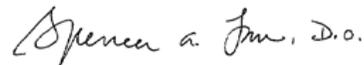
Naturopathic educational curriculum varies by school. There are seven naturopathic programs accredited by the Council on Naturopathic Medical Education (CNME) in the United States. It was only in 2005 that the CNME implemented an approval process for naturopathic residency programs. While opportunities 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 replace fully trained and licensed (DO/MD) physicians and allow naturopaths to be recognized as primary care providers for patient care or insurance purposes.

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 823.** Should you need any additional information, please feel free to contact Nick Schilligo, MS, Associate Vice President, State Government Affairs at [nschilligo@osteopathic.org](mailto:nschilligo@osteopathic.org) or (800) 621-1773, ext. 8185.

Sincerely,



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President, AOA



Spencer Lau, DO  
President, HAOPS

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