



February 15, 2017

The Honorable Pamela J. Althoff  
Illinois State Senate Licensed Activities and Pensions Committee  
121D Capitol Building  
Springfield, IL 62706

Dear Senator Althoff:

**The American Osteopathic Association (AOA) and the Illinois Osteopathic Medical Society (IOMS) are writing to strongly encourage you to oppose SB 708.** This bill would license naturopaths in the state and allow them to use the title of naturopathic physician. The bill, however, fails to define the practice of “naturopathic medicine” or include any details regarding the scope of practice of naturopaths. The AOA and IOMS believe that health practitioners’ scope of practice should be based upon appropriate education, training and competency demonstration requirements. Licensing a new class of practitioners without defining their scope of practice, and allowing them to use the potentially misleading title of physician could place the health and safety of Illinois patients at risk.

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). IOMS is a professional medical organization that represents over 3,500 DOs providing patient care in Illinois.

**The AOA supports 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.** We believe that granting authority to a new class of health care provider to provide services to patients should be directly related to education, training and competency examination. The proposed licensure of naturopaths authorized through this legislation does not provide adequate education and training standards for use of the title “physician,” nor does it include any details or restrictions regarding naturopaths’ scope of practice.

Osteopathic physicians complete four years of osteopathic medical school, which includes two years of didactic study and two years of clinical rotations. Colleges of osteopathic medicine can require upwards of 750 lecture/practice learning hours within just the first two years of education. Clinical rotations in the third and fourth years are done in community hospitals, major medical centers and doctors’ offices. This is followed by 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.

In addition, osteopathic physicians have strenuous continuing education requirements and AOA board certified physicians participate in Osteopathic Continuous Certification. This process ensures that board certified DOs maintain currency and demonstrate competency in their specialty area. It includes lifelong learning and continuous education, cognitive assessment and practice performance and assessment.

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Naturopathic educational curriculum varies by school. There are seven naturopathic schools 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 this legislation requires supervised clinical training of 4,200 hours in length leading to the Doctor of Naturopathy degree, naturopathic residency training is still optional and standard requirements for residency curriculum, rotations or experiences do not exist.

Finally, allowing naturopaths to use the title of physician is likely to deceive the public by implying that the naturopathic practitioner has received complete medical training and is able to provide the full scope of medical services, including the performance of surgery and the prescribing prescription drugs. Recognizing naturopaths by their degree, Doctor of Naturopathy, will help eliminate patient confusion about who is providing their care.

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 Illinois patients by opposing SB 708.** Should you need any additional information, please feel free to contact Nicholas A. Schilligo, MS, AOA Associate Vice President of State Government Affairs, at [nshelligo@osteopathic.org](mailto:nshelligo@osteopathic.org) or (800) 621-1773, ext. 8185.

Sincerely,



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President, AOA



Melanie R. Jessen, DO  
President, IOMS

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