



April 26, 2017

The Honorable Joshua Miller
Chairman
Rhode Island State Senate Committee on Health and Human Services
23 Howie Avenue
Warwick, Rhode Island 02888

Dear Chairman Miller:

The American Osteopathic Association (AOA), the Rhode Island Academy of Family Physicians (RIAFP) and the Rhode Island Society of Osteopathic Physicians and Surgeons (RISOPS) are writing to urge you to oppose S 327. This bill would license naturopaths in the state and allow them to use the title “naturopathic physician.” The bill establishes a broad scope of practice which includes performing physical examinations, ordering diagnostic imaging and prescribing substances as determined by the naturopathic formulary council. It also allows naturopaths to order and administer therapeutic devices and barrier contraception, and utilize subcutaneous, intravenous and vaginal administration.

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. RIAFP is an over 185-member Rhode Island affiliate of the American Academy of Family Physicians, which exists to promote the health of patients, families, and communities of Rhode Island by advancing the specialty of family medicine through education and advocacy. RISOPS is a professional medical organization that represents over 300 DOs providing patient care in Rhode Island.

The AOA, RIAFP and RISOPS 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. 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, fails to provide the appropriate and necessary standards needed to ensure patient safety. Further, allowing naturopaths to use the title “physician” may be deceptive to patients who believe they are seeing a practitioner with a full and unlimited license to practice medicine in all its branches, when they are not.

Osteopathic and allopathic (MD) physician 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 and MDs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.
- Rhode Island-licensed physicians must complete **40 continuing medical education hours per two-year renewal period**.

Naturopathic education:

- **Varies by school**, there are seven naturopathic schools accredited by the Council on Naturopathic Medical Education (CNME) in the United States.
- Traditionally **focuses on holistic and nontoxic approaches** to therapy with a strong **emphasis on disease prevention and optimizing wellness**.
- **May not include any residency training**. While opportunities for one- to two-year residencies exist, this training is still optional and standard residency curriculum, rotations or experiences do not exist.
- This bill specifies that naturopath education must be **three years in length but does not set specific clinical training or continuing education requirements**.

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 Rhode Island patients by opposing S 327**. Should you need any additional information, please feel free to contact Nicholas Schilligo, MS, Associate Vice President, State Government Affairs, at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



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President, AOA



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President, RIAFP



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CC: Mark A. Baker, DO, AOA President-elect
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