
SENATE RESOLUTION

URGING THE BOARD OF NATUROPATHIC MEDICINE TO ADOPT RULES
CONSISTENT WITH ACT 22, SPECIAL SESSION LAWS OF HAWAII
2009, TO ALLOW NATUROPATHIC PHYSICIANS TO PERFORM
PARENTERAL THERAPY.

1 WHEREAS, naturopathic doctors licensed in Hawaii and
2 nationwide have been administering natural substances including
3 vitamins, minerals, and amino acids subcutaneously,
4 intramuscularly, and intravenously (parenterally) for over
5 twenty years; and
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7 WHEREAS, the Board of Naturopathic Medicine issued an
8 opinion in 1984 that the injection of vitamins was within the
9 scope of practice of naturopathic physicians; and
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11 WHEREAS, licensing laws exist to ensure a minimal level of
12 competency in the practice of naturopathic medicine; and
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14 WHEREAS, the licensing examinations accepted by the State
15 of Hawaii have included and covered parenteral therapeutics; and
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17 WHEREAS, all accredited professional schools of
18 naturopathic medicine educate, train, and qualify students to
19 perform parenteral therapeutics including intramuscular,
20 subcutaneous, and intravenous injection techniques and skills;
21 and
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23 WHEREAS, in addition to education, training, and
24 examination, error-free and complaint-free performance
25 demonstrates professional competency among naturopathic
26 physicians of parenteral therapy; and
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28 WHEREAS, for example, insurance companies issuing
29 naturopathic malpractice insurance cover practitioners using
30 parenteral techniques, and the largest malpractice insurance
31 companies have not received one malpractice claim throughout the
32 nation against a naturopathic physician for the misuse of
33 injection methods; and
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1 WHEREAS, in addition, there has not been one case of misuse
2 or harm caused by parenteral therapy reported to the Hawaii
3 Board of Naturopathic Medicine or the Hawaii Society of
4 Naturopathic Physicians; and
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6 WHEREAS, in 2006, the Legislature approved H.B. No. 1155 to
7 clarify that naturopathic physicians have the authority to
8 administer natural medicines by injection but the bill was
9 vetoed by the Governor; and
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11 WHEREAS, the Legislature, through Act 22, Special Session
12 Laws of Hawaii 2009, directed the Board of Naturopathic Medicine
13 to "establish the education and training requirements for
14 parenteral therapy and the standards to administer parenteral
15 therapy" for licensed naturopathic physicians; and
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17 WHEREAS, the Legislature also directed the Board of
18 Naturopathic Medicine to "[a]nnually establish and publish a
19 naturopathic formulary that has been approved by the board for
20 prescription, administration, or dispensing by naturopathic
21 physicians" through Act 22, Special Session Laws of Hawaii 2009;
22 and
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24 WHEREAS, the Board of Naturopathic Medicine established a
25 naturopathic formulary effective January 1, 2010 that
26 specifically prohibits the prescription, administration, or
27 dispensation of formulary items "in injectable form or by
28 injection unless this is specifically authorized by the Board's
29 administrative rules"; and
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31 WHEREAS, however, the administrative rules of the Board of
32 Naturopathic Medicine contain no provisions authorizing the
33 prescription, administration, or dispensation of formulary items
34 via parenteral therapy; and
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36 WHEREAS, the absence of administrative rules allowing the
37 administration of parenteral therapy by naturopathic physicians
38 effectively prohibits the practice; and
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40 WHEREAS, the intent of the Legislature in passing Act 22,
41 Special Session Laws of Hawaii 2009, was to allow naturopathic
42 physicians to practice parenteral therapy pursuant to rules and
43 subject to requirements established by the Board of Naturopathy;
44 and



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2 WHEREAS, accordingly, Act 22 prohibits naturopathic doctors
3 from performing parenteral therapy unless permitted to do so by
4 administrative rules issued by the Board, and the Act's delayed
5 effective date of January 1, 2010 was specifically intended to
6 provide the Board adequate time to pass the requisite
7 administrative rules; and
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9 WHEREAS, the effective prohibition on the use of parenteral
10 therapy by naturopathic physicians that currently exists is in
11 contradiction to the intent of the Legislature in passing Act 22
12 and to the general and historical practice of naturopathic
13 medicine in this State; now, therefore,
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15 BE IT RESOLVED by the Senate of the Twenty-fifth
16 Legislature of the State of Hawaii, Regular Session of 2010,
17 that the Board of Naturopathic Medicine is urged to
18 expeditiously adopt administrative rules in accord with Act 22,
19 Special Session Laws of Hawaii 2009, to allow the use of
20 parenteral therapy by naturopathic physicians that include
21 education and training requirements; and
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23 BE IT FURTHER RESOLVED that the Board of Naturopathic
24 Medicine is urged to immediately adopt rules that grandfather
25 all persons licensed under chapter 455, Hawaii Revised Statutes,
26 prior to January 1, 2010, and allow those persons to perform
27 intramuscular, subcutaneous, and intravenous injection and
28 prescribe, administer, and dispense naturopathic formulary
29 substances manufactured for injection pending passage of the
30 administrative rules; and
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32 BE IT FURTHER RESOLVED that certified copies of this
33 Resolution be transmitted to the Board of Naturopathic Medicine
34 and the Director of Commerce and Consumer Affairs.

