

Julie Nakagawa
721 19th Avenue
Honolulu, HI 96816

February 15, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1. The Legislature received well over 300 emails opposing SB2577, and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals." Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

SB2577 SD1 would require naturopathic physicians to unreasonably reduce their current prescription rights - integral to their services - and add unfair burdens to their practices. This bill is illogical, unnecessary, and clearly biased against the naturopathic profession. It seems intended to foster conflict rather than cooperation in Hawaii's integrative health care community, and it's based on faulty assumptions about the education of naturopathic physicians. For example, the Committee Report incorrectly states that the education of naturopathic physicians "offers very few contact hours of study on pharmacological treatment of disease." In fact, the hours of pharmacology training for naturopathic physicians are nearly the same as that of MDs, and greater than that of osteopaths.

There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws. First, this bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of medicine that differs in many ways from that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that "naturopathic education differs from that received within allopathic or osteopathic medical schools." You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)

2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.

3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to “oversee” another’s jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more. Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary. Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There’s no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there’s no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii’s naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.)

SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii.

I have carefully chosen a naturopathic physician because of their excellent personalized care and skill in caring for my overall well being and to help maintain my good health through my years.

Thank you for your consideration of my testimony in strong opposition to this bill

Sincerely,

Julie Nakagawa

Sasha Hedona
6172 Makaniolu Place
Honolulu, HI 96821

February 15, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1.

Firstly, the Hawaii State Legislature received well over 300 emails opposing SB2577, several weeks ago and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals."

Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

Shame on all of you! You have all been elected and entrusted with the privilege to represent the people of Hawaii's concerns in that Legislature, not to play politics and advance your personal agenda's and the careers of your cronies.

Why must you embarrass the residents of this state by advancing such a regressive bill, and turn the tables on progress?

SB2577 SD1 would require naturopathic physicians to unreasonably reduce their current prescription rights - integral to their services - and add unfair burdens to their practices. This bill is illogical, unnecessary, and clearly biased against the naturopathic profession. It seems intended to foster conflict rather than cooperation in Hawaii's integrative health care community, and it's based on faulty assumptions about the education of naturopathic physicians. For example, the Committee Report incorrectly states that the education of naturopathic physicians "offers very few contact hours of study on pharmacological treatment of disease." In fact, the hours of pharmacology training for naturopathic physicians are nearly the same as that of MDs, and greater than that of osteopaths.

This bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of medicine that differs in many ways from

that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that "naturopathic education differs from that received within allopathic or osteopathic medical schools." You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)

2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.

3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to "oversee" another's jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more.

Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary.

Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There's no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there's no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii's naturopathic physicians have even gone so far as to voluntarily

recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (This is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.)

Sincerely,

Sasha Hedona

Susan S Simon
4111 Paloma Place
Honolulu HI 96816

February 15, 2014

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Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually.

Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians.

It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary.

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Sincerely,
Susan S Simon

Paula Mantel
47-654 Nukupuu Street, Kaneohe, HI 96744
Mailing: POBox 61654, Honolulu, HI 96839

February 15, 2014

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There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws.

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SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have

numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Sincerely,

Paula Mantel
Oahu resident since 1981



Paula Mantel has been the owner of Discover Learning Systems since 1986 teaching learning and communication programs in Hawaii, the U.S. mainland, Australia and Russia for thousands of people. She has managed international programs in Russia, New York and at the United Nations. Her many years of experience as a performing artist bring joy and creativity to her work. Her degrees are a Master of Arts in Communication and Bachelor of Fine Arts in Theater.

www.paulamantel.com

<http://www.facebook.com/paulamantel>

A'o (education)

Ke noke `oe ike a`o, he `ikena moakaka ma laila. (learning is a commitment to new clarity).

Don Peterson
94-212 Lelehua Place
Waipahu, HI 96797

February 15, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians fully prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care are already in place that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have earned prescriptive rights. Furthermore, the Hawaii naturopathic board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and parenteral therapy, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I demand.

Thank you.
Don Peterson

Vicki Sakoda
3511 Kepuhi Street
Honolulu, HI 96815

February 15, 2014

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1 which would limit my access to excellent naturopathic care, prescriptions and procedures.

I am recovering from major reconstructive surgery which involved removal of my fibula bone to be grafted in my jaw where part of the bone had to be removed along with a large benign tumor. Part of the significant healing in my leg and my jaw is attributed to some procedures that have been performed by my naturopath, procedures which involve prescriptions and injections. I could tell almost immediately after some of the procedures that healing was taking place....swelling in my foot was down, some numbness and tightness reduced and more flexibility of areas around incisions.

This is just the latest medical help that naturopathic medicine has been to me. In the past, my naturopath has treated my trigger fingers, persistent coughing, digestive problems, lower back problems, etc. without the use of strong medications, some of which I tend to have allergic reactions to.

I believe that this bill will put Hawaii's medical climate backwards instead of advancing it. So many other states accept the credentials and work of naturopathic medicine without the restrictions such as this bill will place on Hawaii's naturopaths.

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3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to “oversee” another’s jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more.

Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary.

Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There's no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there's no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii's naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.) SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Sincerely,

Vicki Sakoda

Janet Williams-Reyes, CPA/PFS
615 Piikoi St. #1509
Honolulu, HI 96814

February 15, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1. The Legislature received well over 300 emails opposing SB2577, and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals." Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

SB2577 SD1 would require naturopathic physicians to unreasonably reduce their current prescription rights - integral to their services - and add unfair burdens to their practices. This bill is illogical, unnecessary, and clearly biased against the naturopathic profession. It seems intended to foster conflict rather than cooperation in Hawaii's integrative health care community, and it's based on faulty assumptions about the education of naturopathic physicians. For example, the Committee Report incorrectly states that the education of naturopathic physicians "offers very few contact hours of study on pharmacological treatment of disease." In fact, the hours of pharmacology training for naturopathic physicians are nearly the same as that of MDs, and greater than that of osteopaths.

There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws.

First, this bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of medicine that differs in many ways from that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that "naturopathic education differs from that received within allopathic or osteopathic medical schools." You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)

2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.

3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to “oversee” another’s jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more.

Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary.

Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There’s no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there’s no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii’s naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.)

SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Aloha,
Janet Williams-Reyes, CPA/PFS



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IRS Circular 230 Disclosure : To insure compliance with Treasury Regulations (31 CFR Part 10, Section 10.35), we are required to inform you that any tax advice contained in this correspondence including any attachments, was not intended or written by us to be used, and cannot be used by you or anyone else, for the purpose of avoiding penalties imposed by the Internal Revenue Code or other law or for the purpose of marketing or recommending to any other party any transaction, arrangement or other matter. If you desire a formal opinion on a particular tax matter for the purpose of avoiding the imposition of any penalties, our firm must be engaged for that purpose and we will discuss further the Treasury requirements that must be met and whether it is possible to meet those requirements under the circumstances, as well as the anticipated time and fees involved.

Honorable Senator Rosalyn H. Baker,
Honorable Senator Brian T. Taniguchi,
Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

We live in an age where there is a serious shortage of qualified health care practitioners competent enough to deliver quality, evidence based medicine. To date, the Allopathic profession consisting of both Medical Doctors and Osteopathic physicians, cannot keep up with these growing needs from our society. Beyond this, there are increasing segments of the population which chooses to seek health care that is based outside the realms of this allopathic model. People who choose to live more holistically, more health conscious and not based on a system of medicine which surrounds itself almost entirely of disease based treatment. These patients tend to choose Naturopathic medicine as a means towards preventative, holistic, whole person, whole body and quality, patient centered health care. This care is based on science, research and sound evidence; a form of health care the Allopathic model does not provide.

To date, Naturopathic universities not only teach but ensure their students provide this form of care and that we are the absolute authority in this arena. For health conscious individuals wishing to achieve more than just, disease based, trauma based health care, Naturopathic physicians root out the underlying cause of disease and approach treatment with the best of thousands year old natural health care. We provide the most current, science based, evidence based approaches to medical conditions, which includes the use of pharmaceutical interventions, among our many other modalities as appropriate. It is a tool, one of many and at times an absolutely necessity with which we are more than competently trained.

SB2577 SD1 would strip Naturopaths of this ability, segregate and discriminate highly trained physicians and limit the community of Hawaii as a whole for more holistic based health care... If curious, this is roughly 20% of the population... A growing and very large body of electoral constituents seeking other forms of medicine. If you doubt this, simply poll the Baby Boomer generation to see whom they use as providers... a very strong voting population seeking our practitioners.

Furthermore, to restrict and rescind prescribing rights which have already been voted upon for very qualified, board certified, nationally recognized, rigorously trained with no less than 4 years of post-graduate (beyond a bachelors degree) education, who have thoroughly passed and are licensed physicians, is a complete and utter insult. Naturopathic physicians ARE just that, Physicians. We are very well trained and fully competent in prescribing rights among other therapeutic modalities.

Make no mistake, restricting Naturopathic physicians will do nothing more than increase the burden on the current health care system. Restrict the training of current and future Naturopathic physicians. Reduce the influx of qualified health care practitioners to the state of Hawaii. Increase the outflux of current health care providers. Reduce the number of options for the population seeking holistic medicine, all during a time when the nation as a whole is sorely lacking in providers. In other words, this bill will reduce patient options and increase their costs with no benefits to society as a whole.

Point being:

"There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard" - Board of Naturopaths, State of Hawaii.

This bill is a step backwards for those patients who wish to have very high quality health care as well as being very discriminatory against a highly trained physician population... It is unfair, unjust and unfounded.

Sincerely,

Ryan R. Wood, DC
Chiropractic physician
Naturopathic medical student
Natural College of Natural Medicine

P.S.

I have 8 years of post secondary education and am finishing my third year for a dual doctorate totaling 11 years. I wish to practice in Hawaii however if this bill passes, it will decisively stop me from moving to Hawaii. GUARANTEED. Over my lifetime that is roughly 150,000 patient visits I will NOT see or provide in the state of Hawaii. Considering the number of physicians like myself who would choose other locations could add up to hundreds of thousands of patient visits per year. This can easily be extrapolated to business, taxes, payroll and economic stimulation all lost from a pointless bill.

Also, if my 11 years of education is not enough to prescribe a medication... I guess only Jesus himself could give me those rights! What more does the state of Hawaii need? To put this in perspective. I have 11 years of training... Most MD's 8, ND's 8 and most nurses or Physicians Assistants less than 6. Also, ND's in Hawaii are required 15 hours per year of continuing education for prescription rights, one of the highest in the nation. Our physicians are already some of the most well trained in the country.

I implore you to reconsider.

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you oppose SB2577 SD1. This bill would restrict my naturopathic physician from being able to write prescriptions that are important in the health care of my family. Although naturopathic physicians try to minimize the use of prescription medications, in many cases they are essential to the practice of integrative family medicine.

There is no rational basis for this legislation. Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been:

- No complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians
- No cases of naturopathic physicians using prescriptions outside their training and scope of practice
- No overuse of prescriptive authority by naturopathic physicians
- No lawsuits filed in this regard

Instead, the vast majority of the testimony already submitted regarding SB2577 shows that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Megan Ara

Nancy Cranston
381 Mamaki St.
Honolulu, HI. 96821

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians fully prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care are already in place that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have earned prescriptive rights. Furthermore, the Hawaii naturopathic board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and parenteral therapy, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I demand.

Thank you,

Nancy Cranston

Valarie Vaughn
3215-B SE 13th Avenue
Portland, OR 97202

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they

receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary.

In

some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Valarie Vaughn

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. As a naturopathic doctor, my ability to write certain prescriptions when patients need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my practice.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they

have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. . Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect access to the high level of naturopathic care that is currently the standard.

Thank you.
Sincerely,

Suzanne Scopes, ND

Aloha,

I am writing to express my opposition regarding bill SB2577SD1. I am a Naturopathic Doctor with a practice in Kapaau and Waimea Hawaii. This bill will limit my scope of practice and negatively impact patient care. It will also fail to help Hawaii meet its increasing demand for primary care doctors. The one aspect of this bill that I think is warranted is adding in continuing education hours. The lack of CEs required is an oversight that should be corrected.

Why as a state would we gut our Naturopathic Physician's prescribing rights and place a burden on MDs to supervise us, when when we are facing a health care shortage? Supervision makes sense for a Physicians Assistant, but having NDs be supervised is like saying Osteopathic Physicians should be required to have an MD supervise them. We are trained to work independently and we should be treated as independent providers. I would welcome more collaboration with an MD in my practice, but that should be an organic process and not a burdensome and unnecessary mandate.

Also reducing our formulary does not make sense. It is already limited, and we are trained to prescribe and wean people off of what is included within it. Other states with comparable ND prescriptive rights have not had restrictive laws like this passed. Why now in Hawaii? Naturopathic physicians are newer to being licensed in this state, but our safety record is strong and our training is extensive. We should be treated as colleagues, and not be limited in our prescribing rights.

If the impetus for this bill is patient safety, I would argue that Naturopathic doctors are actually quite safe and cautious in their prescribing. I agree that pharmacy CE requirements are a good idea for NDs. The rest of the bill seems regressive and unfair. Naturopathic Physicians generally use pharmaceuticals as our last resort when diet, lifestyle, and other modalities are not enough. We are very judicious as a whole in our use of pharmaceuticals. We are experts at herb drug interactions, because we work with botanical medicine daily and are trained to do so. This bill as it stands would negatively impact our scope of practice, independence and integrity as primary care physicians. I encourage you to add in continuing education requirements for NDs, and to drop the rest of this regressive bill. This will keep us on par with other health care practitioners while still maintaining our scope and independence as practitioners. Thank you for your time and consideration.

Aloha,

Hana Roberts ND

Dear Senator Baker, Vice-Chair Taniguchi, and members of the Senate CPN Committee:

I am Michael Traub, ND. SB2577 SD1 is unnecessary and I urge you to oppose this bill. There have been zero cases of harm reported since naturopathic physicians were granted prescriptive authority on January 1, 2010.

One of the elements in this bill is to collect data on the prescribing patterns of NDs in Hawaii. Earlier this month I conducted a survey on this issue. Here are the results:

Hawaii Society of Naturopathic Physicians

Prescribing Patterns Survey

February 2014

Survey was emailed to all Hawaii NDs on February 2, 2014

Preliminary results as of February 6, 2014:

Responses: 26

Gender: Female 65%, Male 35%

Years practicing as an ND: average 16 years

Primary practice location :

Oahu 38%

Big Island 31%

Maui 19%

Kauai 12%

Percent of respondents who have completed a CNME-approved residency program: 35%

Percentage of practice involving prescription drugs:

<5%: 11.5

5-15%: 42

16-25%: 19

26-50%: 12

51-75%: 12

>75%: 4

Frequency of prescribing or administering drugs:

Never: 0

<once a month: 19%

>once a month but < once a week: 15%

> once a week but < daily: 31%

once or more a day: 35%

Considering prescribing pattern over the last month, list in order of frequency the top 10 medicines you have prescribed:

Average rankings:

Injectable nutrients 21.27

Anti-infectives 20.73

Anesthetics 20.73

Therapeutic injections to joints/soft tissue 18.15

Chelating agents 16.62

Analgesics 16.73

Cardiovascular 16.04

Psychotherapeutic 15.63

Musculoskeletal 15.38

Vaccines 13.85

Renal and genitourinary 13.15

Endocrine 12.27

Immunomodulators and anti-neoplastic 11.77

Blood and electrolytes 10.85

Allergy and anaphylaxis 10.62

Dermatological 10.62

Respiratory 10.04

Obstetric and gynecological 9.92

Ear, nose and throat 9.73

Medical gas 9.73

Diagnostic agents 7.31

Neurological 7.12

Ophthalmic 6.04

What individual medications do you prescribe most frequently (in order of frequency)? (Partial sample of responses):

Compounded vitamin and mineral injectables, human chorionic gonadotropin, lidocaine, procaine, Nature Throid, BiEst, Progesterone

Thyroid, estrogen, progesterone, low dose naltrexone, anti-hypertensive medicines

Bio-identical hormones, thyroid, antibiotics

Thyroid, bio-identical hormones, injectable B12, Myer's cocktail

Lidocaine, Nature Throid, nystatin, amoxicillin, pitocin, Rhogam

Thyroid, injectable vitamin C, injectable B vitamins, Injectable minerals, bio-identical hormone therapy, dimercaptosuccinic acid, ciprofloxacin, fluocinonide ointment, lidocaine

Mahalo for considering this testimony.

Sincerely,

Michael Traub ND
Medical Director

Lokahi Health Center
75-169 Hualalai Rd, Suite 301
Kailua Kona, HI 96740
Phone 808.329.2114
Fax 808.326.2871
mtraubnd@me.com
michaeltraubnd.com

To the Honorable
Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the
Senate Committee on Commerce and Consumer Protection:

I'm writing to express my opposition and request that you to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them and to manage the medications I am on without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no basis for this bill, and every reason to oppose it.

There is no precedent anywhere in North America in which naturopathic physicians have prescriptive rights, for MDs to review NDs prescriptions.

There have been no adverse incidences of prescribing by Hawaii naturopathic doctors since prescriptive rights were granted in 2009.

The training of naturopathic physicians prepares them to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine.

Requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and more.

Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

SB2577 SD1 would also require that naturopathic physicians submit detailed monthly reports of each item they prescribe to the board, that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Jean Hung
~Concerned Patient

Patricia Comstock
2515 W. Magnolia Blvd.
Burbank, CA 91505
February 18 , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii Naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all

equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Sincerely,
Patricia Comstock

Carrie Brennan, N.D.
4-1558 Kuhio Hwy
Kapaa, HI 96746

February 18, 2014

TO: The Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian Taniguchi, Vice Chair, and other-Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

RE: In OPPOSITION of SB2577 Relating to Naturopathic Physicians (Hearing scheduled for Thursday, February 20, 2014 at 10:30 am in Conference Room 229)

Dear Honorable Baker and Committee Members,

I am a naturopathic physician living and practicing in Kapaa for the last 12 years.

I strongly urge you to oppose SB2577 relating to naturopathic physicians. This bill would be detrimental to Hawaii's health care consumers because it would unreasonably restrict naturopathic physicians from practicing according to their high standards of education, training, competency, and safety. Naturopathic physicians were granted prescriptive authority by the legislature in 2009 and since that time there has been a clean record of safety across the state.

With a shortage of primary care physicians in the state I question the motivation behind such proposed legislation, especially since there has not been any Board action brought against a practicing ND in 30 years.

Thank you for your consideration in opposing SB2577.

Sincerely,
Carrie Brennan, N.D.

Carrie Brennan, ND
Integrative Medicine, LLC
4-1558 Kuhio Hwy
Kapaa, HI 96746
(808) 652-7581
www.drcarriebrennan.com

February 15, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1. The Legislature received well over 300 emails opposing SB2577, and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals." Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

SB2577 SD1 would require naturopathic physicians to unreasonably reduce their current prescription rights - integral to their services - and add unfair burdens to their practices. This bill is illogical, unnecessary, and clearly biased against the naturopathic profession. It seems intended to foster conflict rather than cooperation in Hawaii's integrative health care community, and it's based on faulty assumptions about the education of naturopathic physicians. For example, the Committee Report incorrectly states that the education of naturopathic physicians "offers very few contact hours of study on pharmacological treatment of disease." In fact, the hours of pharmacology training for naturopathic physicians are nearly the same as that of MDs, and greater than that of osteopaths.

There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws.

First, this bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of medicine that differs in many ways from that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that "naturopathic education differs from that received within allopathic or osteopathic medical schools." You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)

2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.

3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to "oversee" another's jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more.

Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary. Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There's no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there's no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii's naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.) SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Sincerely,

Juliet Carlson
ph. 737-1887

Robin Midkiff

4151 Nuuanu Pali Drive • Honolulu, Hawaii 96817
Phone: (808) 256-9526 • • E-Mail: robinm99@hawaii.rr.com

Date: February 18, 2014

The Honorable Senator Rosalyn H. Baker, Chair

The Honorable Senator Brian T. Taniguchi, Vice Chair

Other Distinguished Members of the Senate Committee on Commerce and Consumer Affairs
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Position: Very Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Dear Senator Baker,

I have had the pleasure of meeting you on a number of occasions having to do with Friends of the Cancer Center events. While I very much support Western medicine and MDs, I believe very strongly that Naturopathic Doctors are a very important part of the medical care system in Hawaii. Although I am hesitant about sharing my own personal medical issues with the committee, this is so important to me that I am willing to do so. In 2007, due to a problematic cardiovascular diagnosis by great cardiologist, Dr. Calvin Wong, I consulted with an MD, Dr. Blossom Wong and a Naturopathic Physician, Dr. Juanita Wardly, and had my genetic methylation cycles tested. I had a number of genetic mutations which blocked my body's ability to detoxify toxic substances. Dr Wardly recommended a homeopathic formulation of Tetra Hydra Biopterin, otherwise known as BH4. The lab in Switzerland which produces the actual drug was later bought by Merck and the substance is not available except as a drug for exorbitantly priced treatments for a childhood disease. By taking the homeopathic formulation, my cardiovascular condition is back to normal, which is fantastic, because the normal outcome for this particular condition is a 3-5 year life expectancy, with a pretty outrageously expensive drug protocol, which is not very effective. Also problematic for me on an ongoing basis, is that my genetic mutations do not allow me to produce Vitamin B12 on my own, which is critical to getting rid of the toxic substances that we are exposed to every day, like pesticides, herbicides and heavy metals. My current Naturopathic Physician, Dr. Margarethe McLeod, prescribes injectable Vitamin B12 in the form of Methyl Cobalamin for me, which is absolutely invaluable. As a result, I have managed to stay quite healthy!

My son, Erich Deines, is currently taking the Pre-Med required courses to be able to attend SCNM, Southwest College of Naturopathic Medicine located in Tempe, Arizona. He already has a degree in Energy Medicine from the Barbara Brennan School of Healing, but wants to have a Naturopathic Degree from an Accredited College to be able to practice in Hawaii and in Arizona. (He also has a degree in Hospital Administration from the University of Phoenix.) Both my children were strongly affected when their father died in 1998 from Stomach and Liver Cancer, at the age of 55. My daughter and I eat organically whenever possible, and avoid foods like soy and sugar. (I have inherited a terrible allergy to MSG from my Mom, and can't sleep at night when I have soy or msg.) Naturopathic doctors are trained to work with their patients nutritionally to help to support whatever their particular health issues are. I do also have an MD, Dr. Elizabeth Chen Christenson, who is also a licensed acupuncturist. I

truly believe that the medical system should support patients to have healthy outcomes, and avoid major problems. I believe that the Naturopathic training that comes from accredited colleges of Naturopathy is quite rigorous, and unfortunately, many MDs do not even study nutrition as part of their medical school training, making it extremely difficult for many of them to support the whole patient. I believe that the bill is proposing that you have to have an MD oversee the Naturopathic Doctor, which is expensive and unnecessary, given the training and discipline that every Naturopathic Physician that I have met has had.

I am a keiki o ka aina, born and raised in Hawaii Nei. My family has been here in Hawaii since 1897 on my father's side and the 1870's on my mother's side. I am a graduate of Stanford University and a member of the Atherton Family Foundation, which gives away \$5 million a year to many many worthy non profits in Hawaii. This doesn't have anything to do with Atherton, per se, I am just mentioning it because I believe I am quite level headed and have a balanced approach to health. I really believe in freedom of choice in terms of medical options, and would take an alternative option to health care when it is appropriate, and would follow Western medicine protocol when it is appropriate.

I am writing to ask you to do everything in your power to oppose SB2577 SD1. I very much appreciate your taking the time to read my letter.

Warm aloha,

Robin Midkiff

As a 37 year veteran Lamaze Prepared Childbirth Educator, I am concerned about the legislation that threatens women's choices in how they birth in Hawaii.

I was even fired from Castle Medical Center in Kailua in December of 2013 after working there for 23 years. I was hired there to teach the Lamaze method of birthing which teaches expectant women and men to take part in the decisions about how their babies are born. Doctors there and the hospital itself discourage discriminating education that promotes question asking and informed consent as well as informed refusal. My firing was based on trumped up accusations--and for the record was one of my proudest moments. To be fired doing one's job description, telling the truth, and teaching only evidence-based information is a beacon that shows Castle Medical Center to be a poor choice for couples seeking pregnancy and birth care.

That being the case and also something that is also true of most other Hawaii hospitals means that patients are limited in their choices for prenatal and labor/birth care in Hawaii. Limiting the scope of practice for midwives and other naturopathic practitioners limits couples' abilities to responsibly choose the care of their hearts, minds and bodies.

I'm writing to request that you oppose SB2577 SD1. This bill would restrict naturopathic physicians from being able to write prescriptions that are important in the health care of Hawaiian families. Although naturopathic physicians try to minimize the use of prescription medications, in many cases they are essential to the practice of integrative family medicine.

There is no rational basis for this legislation. Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been:

- No complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians
- No cases of naturopathic physicians using prescriptions outside their training and scope of practice
- No overuse of prescriptive authority by naturopathic physicians
- No lawsuits filed in this regard

Instead, the vast majority of the testimony already submitted regarding SB2577 shows that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement

that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Janis Bush

Dear Hawaiian Legislators:

Please understand that to revoke the prescriptive rights of licensed Naturopathic Physicians in the great state of Hawaii would be an immense, unforgivable legislative mistake that will ultimately serve only to harm the already medically under-served people of Hawaii. Naturopathic Physicians have proven themselves to be fully capable of the proper prescribing and management of pharmaceutical medications. They are extensively trained in biochemistry and pharmacology and are generally far more cautious and mindful in their use of these substances than their MD & DO counterparts. The fact is that compared to MDs & DOs, far fewer malpractice suits are filed against NDs, and if NDs did not know how to responsibly and professionally manage their patient's pharmaceutical medications this would certainly not be the case. Furthermore, forcing NDs to prescribe under supervision of MDs & DOs will place additional, unnecessary burden on the already overtaxed medical industry in Hawaii. This will make quality healthcare for the citizens of Hawaii less affordable and more confusing. This bill really appears to be a back-handed attempt to make it more difficult for Naturopathic physicians to effectively care for their patients. To do so would ultimately hurt the people of Hawaii more than anyone else.

Please, consider this in your mind and in your heart and you will undoubtedly reach the conclusion that to pass this bill is a clear step in the wrong direction - a step taken based on false premises. This is not about Naturopathic medicine versus Allopathic medicine, it is about the need for them to work together with open communication and mutual respect so that the best interests of the patients may be most effectively pursued.

Thank you for your time and consideration. I trust that you are well-meaning people, of integrity, with only the best interests of your constituents in mind, and that therefore you will make the right choice.

-Brett Shenkman

Mitzi Gold Ph.D. LCSW MPH 1016 Kapahulu Ave #265 Honolulu HI. 96816 February 18, 2014

Position of Testimony: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

The hearing for this measure is at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Members of the Senate Committee on Commerce and Consumer Protection:

I hope that you will do everything you can to oppose SB2577 SD1. This bill would require naturopathic physicians to reduce or give up prescription rights that are necessary to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the inappropriate restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board.

This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care.

Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Mitzi Gold Ph.D. LCSW MPH

Ha Seung Chung

- McCarty Hall, Room 660
- 4000 15th Avenue NE
- Seattle, Washington 98195-4470

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians
Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come

to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Ha Seung Chung
University of Washington - 2016
Mechanical Engineering Major

Dr. Monique Yuen
619 Kapahulu Ave Ste. 208
Honolulu, HI 96815

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other-Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the

naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my ability to provide high level of naturopathic care.

Thank you,

Monique Yuen, ND

February 18, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1. The Legislature received well over 300 emails opposing SB2577, and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals." Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

SB2577 SD1 would require naturopathic physicians to unreasonably reduce their current prescription rights - integral to their services - and add unfair burdens to their practices. This bill is illogical, unnecessary, and clearly biased against the naturopathic profession. It seems intended to foster conflict rather than cooperation in Hawaii's integrative health care community, and it's based on faulty assumptions about the education of naturopathic physicians. For example, the Committee Report incorrectly states that the education of naturopathic physicians "offers very few contact hours of study on pharmacological treatment of disease." In fact, the hours of pharmacology training for naturopathic physicians are nearly the same as that of MDs, and greater than that of osteopaths.

There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws.

First, this bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of medicine that differs in many ways from that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that "naturopathic education differs from that received within allopathic or osteopathic medical schools." You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)

2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.

3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of

naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to “oversee” another’s jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more. Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary.

Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There’s no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there’s no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii’s naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.)

SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Sincerely,

Allen D, Fechtig, PhD

Danielle Szabo, ND
223 Center St
Leavenworth WA 98826

February 18, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1. The Legislature received well over 300 emails opposing SB2577, and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals." Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

SB2577 SD1 would require naturopathic physicians to unreasonably reduce their current prescription rights - integral to their services - and add unfair burdens to their practices. This bill is illogical, unnecessary, and clearly biased against the naturopathic profession. It seems intended to foster conflict rather than cooperation in Hawaii's integrative health care community, and it's based on faulty assumptions about the education of naturopathic physicians. For example, the Committee Report incorrectly states that the education of naturopathic physicians "offers very few contact hours of study on pharmacological treatment of disease." In fact, the hours of pharmacology training for naturopathic physicians are nearly the same as that of MDs, and greater than that of osteopaths.

There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws. First, this bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of medicine that differs in many ways from that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that "naturopathic education differs from that received within allopathic or osteopathic medical schools." You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)
2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.
3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians

review and monitor all of their prescription activities, since the training of naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to “oversee” another’s jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more. Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary. Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There’s no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there’s no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii’s naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.)

SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Sincerely,

Danielle Szabo, ND

DEAR LEGISLATORS,

THIS IS A JOKE, RIGHT???

In My Humble Opinion MD's should be under the supervision of ND's as the healing ratio per patient is much higher and 'do no harm' rate is non-existent. What is behind such a thoughtless effort?

I spend less that \$400 a year for complete and effective health care through my holistic practitioner! Insurance that I would NOT use for allopathic (typical Western modalities) medicine would cost me \$400 a month after \$1000 out of my own pocket expenses. And someone thinks that ND's need to be under the supervision of MD's. GIVE ME A BREAK!!

IF SB2577SD1 PASSES IN HAWAI'I THERE WILL BE A LOT OF VOTES LOST FOR THOSE THAT SUPPORT IT, BECAUSE A VERY HIGH PERCENTAGE OF FOLKS HERE USE ND'S RATHER THAN MD'S

MALAMA KE KINO!

Appreciatively)(Skye Coe

Claire Rausch
1808 Paula Dr., Honolulu, HI, 96816

February 18, 2014

Position of Testimony: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

The hearing for this measure is at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Members of the Senate Committee on Commerce and Consumer Protection:

I hope that you will do everything you can to oppose SB2577 SD1. This bill would require naturopathic physicians to reduce or give up prescription rights that are necessary to their services. My naturopathic doctor's ability to write prescriptions for me for my women's health needs when I need them, without the inappropriate restrictions proposed by SB2577 SD1, is an important part of my health care. The naturopathic care I have received through my naturopathic practitioner has resulted in my health improving in a manner not matched by my previous primary care physician and I strongly encourage you to be a part of not letting the above senate bill interfere with my healthcare choices which are agreeable to me.

There's no good reason for this bill, and every reason to oppose it; it sounds to me like an AMA bid to try to corral healthcare practices under the auspices of MDs unnecessarily when this state already faces a shortage of healthcare providers as it is. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever which I know of where patient harm pertaining to these prescription rights has been brought to the naturopathic Board. From what I have seen there has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard.

Instead, the public has benefited greatly from their prescriptive authority. For myself, the naturopathic care I have received through my naturopathic practitioner has resulted in my health improving in a manner not matched by my previous primary care physician and I strongly encourage you to be a part of not letting the above senate bill interfere with my healthcare choices which are agreeable to me. I have seen that the training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, I am reassured as

I understand that the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians and feel my practitioner exemplifies this standard of care in her practice. Personally I like the idea that Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

I agree that one of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board.

This is an extremely ill-conceived proposal; MDs don't even practice in this respect with each other and I believe it unreasonable to give them this privilege over a healthcare provider with a dissimilar background as a naturopathic physician is a very different type of medical expert than an MD. With all due respect I agree that MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities although I must say I have seen they overall MDs are not willing to admit to these facts. Too often I have felt that arrogance 101 training seems to have been a well attended course in medical school. I have found that the education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care and much prefer to seek out this kind of healthcare to the point of covering the cost of it out of my own pocket while paying my portion of medical health care premiums for insurance which I do not avail myself of.

Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. Respectfully, I do not understand nor support legislative action that would require one type of doctor to oversee and review a very different type of practitioner's practice which I only see creating endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

Again, respectfully I see as unnecessary and out of line the parts of SB2577 SD1 which would require that naturopathic doctors submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. These requirements would only serve to hinder naturopathic physicians and reduce their effectiveness by placing unnecessary, inappropriate, and impractical burdens on their practices. These requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians and limit the kind of healthcare which I, as a consumer, choose. I also feel it will reduce the quality

of naturopathic care and the effectiveness of a valued primary care providers which this state can ill afford to do. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I choose and deserve.

Thank you for the opportunity to offer my testimony, Claire Rausch

Subject Line: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you oppose SB2577 SD1. This bill would restrict my naturopathic physician from being able to write prescriptions that are important in the health care of my family. Although naturopathic physicians try to minimize the use of prescription medications, in many cases they are essential to the practice of integrative family medicine.

There is no rational basis for this legislation. Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been:

- No complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians
- No cases of naturopathic physicians using prescriptions outside their training and scope of practice
- No overuse of prescriptive authority by naturopathic physicians
- No lawsuits filed in this regard

Instead, the vast majority of the testimony already submitted regarding SB2577 shows that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be

discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Genie Kuniyoshi

February 18th, 2014

Britta Zimmer
15 Kanoa St. Hilo, HI 96720

TO: The Honorable Senator Josh Green, Chair, the Honorable Senator Rosalyn H. Baker, Vice Chair, and other Distinguished Members of the Senate Committee on Health!

RE: PLEASE OPPOSE SB2577 Relating to Naturopathic Physicians

Dear Honorable Chair Green, Vice Chair Baker, and Committee Members,

I strongly oppose SB2577 relating to naturopathic physicians. There is no precedent for such regressive legislation in any other state where NDs have prescriptive authority. I have been a practicing Naturopathic Physician for 10 years. I completed a 2 year comprehensive family practice residency in Portland, Oregon where I held a DEA number as well as full prescriptive authority for controlled substances along with injectable medications and other pharmaceutical medications. Since moving to Hawaii, I have continued to uphold the standards of my Oregon licensure for continuing education hours including 15 accredited hours of pharmacology which I have documented on a yearly basis. I support the motion to enforce continuing education hours in pharmacology for the Hawaii Naturopathic Physicians.

However, I strongly disagree with the idea to restrict the prescriptive authority of Naturopathic Physicians. This would put more strain on our already strained healthcare system in Hawaii.

As a Naturopathic Physician, I am currently required to recognize and exercise professional judgment within the limits of my qualifications, and collaborate with others, seek counsel or make referrals as appropriate. Everyday, I practice in collaboration with other healthcare professional including medical doctors, doctors of osteopathy, and doctors of chiropractic medicine. I choose the treatments and modalities most suited for my patients' individual healthcare needs. Often times this includes prescribing medications within the standards of practice which will prevent patients from flooding the emergency departments or developing more serious conditions due to lack of care and inability to be seen promptly.

There have been no cases of harm, mismanagement, or prescribing impropriety against a ND's care brought to the Board since we gained prescriptive authority on January 10, 2010. In fact, no Board action has been brought against a practicing ND in the last 30 years.

This bill would be detrimental to Hawaii's health care consumers because it would unreasonably restrict naturopathic physicians from practicing according to their

high standards of education, training, competency, and safety.

The people of Hawaii have repeatedly demanded access to quality naturopathic care because naturopathic physicians are an invaluable part of our healthcare system. As the general practitioners and primary care physicians who are most highly trained in preventive medicine, we are uniquely qualified to collaborate with other health care professionals in providing truly complimentary care. By unreasonably restricting naturopathic physicians from practicing according to their training, SB2577 would have many negative consequences on the overall quality of health care in Hawaii.

Thank you for your consideration. I look forward to hearing of your opposition to SB2577

Sincerely,

Britta Zimmer, ND

To Senator Rosalyn Baker, Chair, Senator Brian Taniguchi, Vice-Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I am writing to oppose SB2577 SD1.

I have suffered from several health conditions since 1995. I went to highly acknowledged physicians and was mis-diagnosed and prescribed corticosteroids and antibiotics by specialists in various fields over the years. At one point I was diagnosed with rosacea, and the dermatologist said, "no, your rash is NOT a food allergy."

It wasn't until I sought evaluation by a licensed naturopathic doctor that someone finally "got it". She ordered some tests, discussed the results with me (for much longer than any MD ever has!), and gave me diagnoses and treatment recommendations.

Guess what? Within 4 days of avoiding a food allergen, my face COMPLETELY CLEARED! There was no more rash or "rosacea". And my dermatologist (an M.D.) said it wasn't a food allergy.

Needless to say, my licensed naturopathic doctor has helped me so much with my specific health problems in a few months, more than all of the medical doctors in the past 19 years.

My licensed naturopathic doctor has extensive knowledge of nutritional supplements and Western medicine medications. (I DO support the requirement for continuing education units in pharmacology.) Although my health ailments have not completely disappeared, I am regaining my health, feeling quite a reduction in pain, and am responding well to alternative supplements (rather than just medications).

In closing, I request that you do not allow SB2577 SD1 to go through. Thank you.

Robin Wielins
Honolulu

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing in opposition to SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. The naturopathic doctor's ability to write certain prescriptions when a patient needs them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of the choice of health care.

The public has benefitted greatly from the prescriptive authority granted to Hawaii's naturopathic physicians. I have not heard of any cases of overuse nor any lawsuits related to this authority. The training of naturopathic physicians fully prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care are already in place that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii.

The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have earned prescriptive rights. The Hawaii naturopathic board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely inappropriate proposal. A naturopathic physician is a very different type of medical expert than an MD. MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's

practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and parenteral therapy, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

The proposed bill will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. Do not limit prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect the access and choice to the high level of naturopathic care that people in Hawaii deserve.

Thank you,
Lauralee Baoy
3476 Kalihi St Apt B
Honolulu, HI 96819

Ellen Ostler
2548 East Manoa Road
Honolulu, HI 96822

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you PLEASE do everything in your power to OPPOSE SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care. I have been under naturopathic care for over 30 years and would not be alive today without it.

Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs' review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be

independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you very much for your support.

Sincerely,

Ellen Ostler

Robert Smith, ND
February 19, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1. The Legislature received well over 300 emails opposing SB2577, and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals." Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

SB2577 SD1 would require naturopathic physicians to unreasonably reduce their current prescription rights - integral to their services - and add unfair burdens to their practices. This bill is illogical, unnecessary, and clearly biased against the naturopathic profession. It seems intended to foster conflict rather than cooperation in Hawaii's integrative health care community, and it's based on faulty assumptions about the education of naturopathic physicians. For example, the Committee Report incorrectly states that the education of naturopathic physicians "offers very few contact hours of study on pharmacological treatment of disease." In fact, the hours of pharmacology training for naturopathic physicians are nearly the same as that of MDs, and greater than that of osteopaths.

There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws.

First, this bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of medicine that differs in many ways from that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that "naturopathic education differs from that received within allopathic or osteopathic medical schools." You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)

2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.

3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of

naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to “oversee” another’s jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more. Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary. Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There’s no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there’s no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii’s naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.)

SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Sincerely,
Robert Smith, ND

I am opposed to the legislation contained in SB2577SD1. There is no practical reason for this bill. I support Naturopathic Doctors in Hawaii in practicing what they were taught. I also want NDs to have the right to give good quality of care without being overseen by a medical Doctor.

Richard Billman
3283 Waileia Place
Kihei, HI 96753

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

I'm writing to request that you oppose SB2577 SD1. I am a naturopathic physician specializing in the treatment of medical conditions that are co-morbid with and underlie the symptoms of autism, having been trained through the Medical Academy of Pediatric Special Needs and Autism Research Institute. These children suffer from multiple medical conditions including food allergies, chronic infections, impaired methylation and sulfation (liver detoxification pathways), autoimmune conditions, increased oxidative stress and neuroinflammation. As a result, many of these children need the support of pharmaceutical medications, which I utilize in conjunction with nutritional counseling and vitamin/mineral supplementation to correct nutrient deficiencies. Approximately 75% of my patient population have diagnoses on the autism spectrum or other special needs. These children show significant clinical improvement with the medications prescribed for their individual medical conditions.

If this bill goes through, many of the medications I utilize in my practice for the benefit of these children will no longer be available to them. I am currently the only physician (including MDs, DOs and NDs) in Hawaii who has been trained through the Medical Academy of Pediatric Special Needs. While I work cooperatively with MDs and DOs, there are no other physicians in the state with adequate training to supervise my clinical practice including the use of pharmaceuticals. This legislation also prevents NDs from being able to use medical oxygen, which I currently keep on hand in my office for emergencies. The supposed intent of this legislation is to make medical practice safer for patients, but this is one example where it actually accomplishes the opposite.

The other 25% of my practice involves integrative family medicine, in which basic blood pressure and diabetes medications are often necessary. This legislation would prevent my other patients from having access to these medications that are prescribed under my supervision. There is no rational basis for this legislation. Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been:

- No complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians
- No cases of naturopathic physicians using prescriptions outside their training and scope of practice
- No overuse of prescriptive authority by naturopathic physicians
- No lawsuits filed in this regard

Instead, the vast majority of the testimony already submitted regarding SB2577 shows that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and

they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my patients' access to the high level of naturopathic care that they deserve.

Mahalo nui loa for your consideration.

Sincerely,

Dr. Kathryn Taketa-Wong, N.D., L.Ac.
Naturopathic Physician & Licensed Acupuncturist
Medical Academy of Pediatric Special Needs Fellowship Candidate
Specializing in Autism Spectrum Disorders, ADHD & Other Special Needs

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Honolulu, HI 96813
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February 18th, 2014

To: The Honorable Senator Rosalyn H. Baker, Chair,
The Honorable Senator Brian T. Taniguchi, Vice Chair,
Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

Hearing: 10:30 am on February 20th, 2014 in Conference Room 229

RE: Opposition -Senate Bill 2577SD1

Dear Senators

I am in opposition to SB 2577SD1. My name is Dr Steven Dubey, Naturopathic Physician . I have maintained a busy practice in Lihue, on the island of Kauai for the last 33 years. I did serve on the Board of Naturopathic Examiners in the 1990s, for 8 years.

In my practice I have provided naturopathic health care for all ages, from infants to the elderly, with nearly every ailment know to the human species. From past Mayors, to members of our Police and Fire Departments, County Council members, Kauai State Senators and Representatives, agricultural and visitor industry workers, all have chosen Naturopathic Medicine as their preferred health care choice, at some point in their lives.

In recent years, thanks to the wisdom and insightful planning and decision making for Hawaii's health care needs , the Hawaii State Legislature MODERNIZED the Hawaii Revised Statute 455 pertaining to licensing of Naturopathic Doctors. This modernization helped to create the Naturopathic Board's Naturopathic Formulary.

It modernized the statute to greater reflect our education and scope of practice, which includes that of primary health care providers.

Senate Bill 2577 seeks to reverse the countless hours of work in decision making already carried out in this matter. The decision making was done by legislators, members of the community, Department of Commerce and Consumer Affairs personnel, and by the Naturopathic, Pharmacy and Medical professional representatives.

The Continuing Medical Education suggested is in essence in alliance with our profession's intent of ever greater competency in serving the health care needs of Hawaii's population, but should be left up to the Naturopathic Board of Examiners to implement in Rules and Regulations.

It would appear that SB2577SD1 seeks to strip away the progress made by so many informed professionals AND the legislature.

Shall we reinvent the wheel next?

Thank you
Respectively Submitted

Dr Steve Dubey
Licensed Naturopathic Physician
Licensed Acupuncturist
Natural Health Clinic
3093 Akahi St
Lihue HI 96766
(808)245-2277
dr.dubey@hawaiiantel.net
www.nhckauai.com

FEBRUARY 18TH, 2014

TESTIMONY Regarding SB2577SD1

Naturopathic Formulary should remain as it is, with the Board retaining the authority to add or delete any items on the formulary as experience demands. I DO NOT WANT NATUROPATHIC DOCTORS TO BE UNDER MEDICAL DOCTORS.....THIS IS WHY I GO TO THE NATURATHIC DOCTOR AND NOT TO A REGULAR DOCTOR IN THE FIRST PLACE....I WANT THIS SEPARATION. THERE IS A CONFLICT OF INTEREST IN THE WAY BOTH MEDICINES ARE PRACTICED. I WOULDN'T DO IT THE OTHER WAY AROUND EITHER....BOTH SHOULD BE FREE TO PRACTICE MEDICINE ACCORDING TO THEIR INDIVIDUAL TRAINING. I WANT THIS SEPARATION AS I WANT THE PURITY OF BOTH. IT IS OUR RIGHT TO CHOOSE WHO WE WANT TO GO TO FOR OUR PHYSICAL WELL BEING AND THIS SHOULD NOT BE INTERFERED WITH.....WE DID NOT ASK FOR THIS. WHO HAS DECIDED ONE DOCTOR KNOWS MORE THAN ANOTHER? WHERE HAS THIS REQUEST ORIGINATED? THE MOTIVE BEHIND THIS REQUEST TO PUT NATUROPATHIC DOCTORS UNDER THE RULE OF ALLOPATHIC DOCTORS IS WHAT SHOULD BE UNDER SCRUTINY.....

DHYAN SANDHYA
KIHEI, HAWAII
808 344 1796

At issue:

What is the motivation for such onerous legislation?

There have been no cases of harm, mismanagement, or prescribing impropriety against an ND's care brought to the Board since we gained prescriptive authority on January 10, 2010. (In fact, no Board action has been brought against a practicing ND in the last 30 years, since our longest practicing NDs have been in Hawaii)

There is no precedent for such regressive legislation in any other state where NDs have prescriptive authority.

Misguided approach to force NDs into a subordinate role and to limit their scope of practice, while burdening MDs and the Board, and with NDs playing an increasingly important role (dating back to 1927), with the increasing need for more well-educated, well-trained, well-equipped primary care docs in Hawaii to fill the void.

Even with comprehensive and comparable educational standards as independent primary care providers, NDs throughout the Islands, cooperate, consult and maintain positive relationships with other health professionals and MDs when it is in the best interest of the patient.

Pharmacology Knowledge

NDs have comparable hours of pharmacology courses to other medical prescribing professionals. (# ?)

1994 Legislative audit resulted in discontinuing CE. Most NDs attend continuing ed courses on their own, that include pharmacology.

HSNP proposes, 15 CE biennially. (Adequate and sufficient! Under the organization of the local HSNP, approval by national AANP and reviewed by ND Board)

Pharmacology Application

2010 Board members, Drs. Traub and Kern, met with pharmacy board in a cooperative effort to answer questions regarding ND prescribing patterns and to present a unified paper that would be distributed to all pharmacists.

Prescribing patterns, specifically as it related to medical specialty medication, was used in our formulary primarily in supporting and transitioning patients eventually wanting to be weaned from medication to other effective forms of health care. We also informed members that there are specialty practices within naturopathic medicine but that the former rationale was primarily true.

Naturopathic Formulary should remain as it is, with the Board retaining the authority to add or delete any items on the formulary as experience demands.

Board has adopted Standards of Practice and Care that set higher standards for NDs, for competence and safety, than any other state in the country.

Section 16-88-80(a)(6)(A), Hawaii Administrative Rules, requires that a naturopathic physician shall maintain proficiency and competence, and be diligent in the provision and administration of patient care.

Naturopathic physicians are also (already) required to recognize and exercise professional judgment within the limits of the naturopathic physician's qualifications, and collaborate with others, seek counsel or make referrals as appropriate.

Anne Frances Hardy
613 Pamaele Street
Kailua, HI 96734

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I am writing express my strong opposition to bill SB2577 SD1. As a Naturopathic Physician, I would not be able to properly serve my role as a primary care physician for my patients if this bill is adopted. It is quite discouraging for me to have dedicated 10 years to higher education plus an additional 2 years of naturopathic residency training to have most of my prescription rights taken away on baseless claims. As I am sure you have been made aware, Naturopathic Physicians undergo extensive training in pharmacology—both in the classroom and in clinical rotations—and must demonstrate this competency in licensing board exams.

I chose to practice naturopathic medicine because I believe true health cannot be attained by taking a bunch of pills. With this said, there are times when more natural treatments are not enough and prescription drugs are the most appropriate treatment for my patients. If this is the case, I prescribe with caution and properly counsel my patients on known interactions and possible side-effects. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. My colleagues in states entrusted with a more expanded scope of practice would certainly agree this bill is a major step back for naturopathic medicine in our country.

I find the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions as ill-conceived, and frankly, demeaning to my profession. I do not know any MD who would want to take on the legal responsibility of such task, nor should they. In addition, many MDs are not equipped with the expertise to do so, especially concerning naturopathic hormone prescriptions. I view the additional requirement to submit a monthly report of prescriptions to the board as unfair and discriminating since this requirement has never been placed on other types of physicians.

If this bill moves forward as written, it will reduce the quality of naturopathic care available in Hawaii and the limit my ability to serve my community as a primary care provider. At a

time when primary care providers are in great need, this bill will deter quality NDs from moving to our island and drive current practicing doctors to leave. I hope this is not the hidden agenda of this bill. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and help ensure health of my profession.

Best regards,

--

Dr. Anne Frances Hardy

Naturopathic Physician
Licensed Acupuncturist

Confidential Communication:

This e-mail message and any attachments are intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and destroy the original and any copies of this e-mail.

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you oppose SB2577 SD1. This bill would restrict my naturopathic physician from being able to write prescriptions that are important in the health care of my family. Although naturopathic physicians try to minimize the use of prescription medications, in many cases they are essential to the practice of integrative family medicine.

Since beginning Biomedical treatment of my Autistic son, Daniel, my wife and I have already noticed important changes in his behaviors for the better. Dr. Taketa-Wong is guiding us through this treatment process and so far all of her recommendations have brought promised positive changes to reality. First we started Danny on a gluten, casein, sugar and soy-free diet and some multi-vitamin supplements. She then performed several bloodtests which also revealed reactions to eggs and yeast and discovered yeast overgrowth in the digestive system. She then prescribed Nystatin and Vancomycin in order attack this issue. Dr. Taketa-Wong has been very thorough and explained every part of treatment process. All of her recommendations pertaining to the treatment have been backed by the evidence found in the reality of his behavioral improvements. We truly need her recommendations and guidance at this time and we would be devastated if she could no longer write prescriptions for necessary medications or even continue her practice here on Oahu. It is obvious that ABA, OT/PT, and Speech is NOT ENOUGH, even though we continue to provide this therapy for him as well.

Furthermore, there is no rational basis for this legislation. Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been:

- No complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians
- No cases of naturopathic physicians using prescriptions outside their training and scope of practice
- No overuse of prescriptive authority by naturopathic physicians
- No lawsuits filed in this regard

Instead, the vast majority of the testimony already submitted regarding SB2577 shows that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the step of voluntarily

recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Sincerely

Bryan K. Rouse on behalf of my son, Daniel, and Family

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- [English \(United States\)](#)

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you oppose SB2577 SD1. This bill would restrict my naturopathic physician from being able to write prescriptions that are important in the health care of my family. Although naturopathic physicians try to minimize the use of prescription medications, in many cases they are essential to the practice of integrative family medicine.

There is no rational basis for this legislation. Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been:

- No complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians
- No cases of naturopathic physicians using prescriptions outside their training and scope of practice
- No overuse of prescriptive authority by naturopathic physicians
- No lawsuits filed in this regard

Instead, the vast majority of the testimony already submitted regarding SB2577 shows that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and

much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Emma C. Reeder

Allison Jacobson
PO Box 131
Anahola, HI 96703

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of

naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Allison Jacobson

Michael Tanenbaum
5204 Makalena St.
Honolulu, HI 96821

February 18, 2014

Position of Testimony: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

The hearing for this measure is at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Members of the Senate Committee on Commerce and Consumer Protection:

I hope that you will do everything you can to oppose SB2577 SD1. This bill would require naturopathic physicians to reduce or give up prescription rights that are necessary to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the inappropriate restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very

different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

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If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Michael Tanenbaum

Mahalo for affording me the opportunity to provide comment and testimony on the matter of prescribing by naturopathic physicians in Hawaii.

By way of introduction I am a Board Certified internist and rheumatologist who has practiced for 52 years in Massachusetts. I have served on the Board of Trustees of the Massachusetts Medical Society for many years and am a professor (clinical) of medicine at Tufts.

I own property in Kilauea, Kauai where I am currently on vacation.

I wish to focus my comments regarding this bill on the involvement and responsibility it places directly on M.D. (and other degreed) physicians licensed in Hawaii to undertake "collegial" relationships with naturopathic doctors for the purpose of monitoring (and presumably at some point reporting on such practice.

This puts a tremendous burden in terms of responsibility, special postgraduate educational effort (since medical doctors are not educated in trained in or familiar with the naturopathic formulary, pharmacology and practices), significant liability concerns, time to be taken from there already full working schedules, etc.

I submit that while I find this bill otherwise unneeded, poorly focused and unnecessary relative to the licensed naturopaths of Hawaii who must be graduates of one of the five fully accredited US and two in Canada, the proposed direct role in this process is a flawed concept which will make the bill unworkable as it will be decisive at a time when the care of our patients must be inclusive and place untenable burdens on the Hawaiian medical doctors.

Finally, it is critical that this entire matter be reviewed by the Hawaiian State Medical Society and the Board of Registration/ Licensure at the very least as well as the medical liability carriers.

Mahalo for the chance to share my concerns with you.

Hubert I. Caplan, M.D.

6 Wilson St.

Wellesley, Ma 02482

Sent from my iPhone

SB2577

Submitted on: 2/18/2014

Testimony for CPN on Feb 20, 2014 10:30AM in Conference Room 229

Submitted By	Organization	Testifier Position	Present at Hearing
alicia morrier	Individual	Oppose	No

Comments:

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

Do not reply to this email. This inbox is not monitored. For assistance please email webmaster@capitol.hawaii.gov

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to ask you to oppose SB2577 SD1.

As a scientist, the conclusions I draw in my work must be based on data. As a registered Hawaii voter, I hope that my elected representatives also make decisions informed by data, especially when the policy decision directly impacts the physical health of their constituents.

For this particular bill that seeks to significantly limit the prescriptive authority of naturopathic physicians, my questions are these: What data support this bill? What are the quantitative metrics that justify dramatically limiting the ability of my naturopathic physician to care for my family? Absent data, I question the motives behind this legislation.

There's also the issue of unintended consequences. If you were a naturopathic physician, would having an MD oversee your work help or hurt your ability to care for your patients? What would motivate an MD to desire to oversee naturopathic physicians? Would oversight increase the level of care or merely the administrative burden? Who will pay for the oversight by the MD? Will an insurance company pay two doctors to essentially perform the same service? Will this bill increase or decrease the cost and efficiency of the health care system? Will this bill motivate more or fewer physicians to practice medicine in Hawaii? Will this bill limit or expand voters' access to quality health care in Hawaii?

From a personal perspective, the care that my family has received from our naturopathic physician far surpasses all the care we have ever received from any family practice MD, in terms of time, attention and results. SB2577 SD1 will dramatically reduce our physician's ability to meet my family's medical needs.

Please vote no on SB2577 SD1.

Sincerely,

D. Benjamin Reeder, PhD

From: Carol <clcarpen@gmail.com>
Date: February 19, 2014 at 1:15:31 AM PST
To: Carol Carpenter <clcarpen@gmail.com>

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Sent from my iPhone

Elsha Bohnert
1676 Ala Moana Blvd. #1309
Honolulu HI 96815

February 15, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

To Senator Rosalyn H. Baker, Chair
Senator Brian T. Taniguchi, Vice Chair
and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to voice very strong objections to SB2577 SD1. The Legislature received well over 300 emails opposing SB2577, and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals." Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

SB2577 SD1 would require naturopathic physicians to unreasonably reduce their current prescription rights - integral to their services - and add unfair burdens to their practices. This bill is illogical, unnecessary, and clearly biased against the naturopathic profession. It seems intended to foster conflict rather than cooperation in Hawaii's integrative health care community, and it's based on faulty assumptions about the education of naturopathic physicians. For example, the Committee Report incorrectly states that the education of naturopathic physicians "offers very few contact hours of study on pharmacological treatment of disease." In fact, the hours of pharmacology training for naturopathic physicians are nearly the same as that of MDs, and greater than that of osteopaths.

There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws.

First, this bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of

medicine that differs in many ways from that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that “naturopathic education differs from that received within allopathic or osteopathic medical schools.” You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)

2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.
3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?
4. Appointing one type of physician to “oversee” another’s jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more.

Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary.

Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There’s no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefitted enormously as a result of the current prescriptive rights of naturopathic physicians; countless

people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there's no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii's naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.)

SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Sincerely,
Elsha A. Bohnert

Hello,

I strongly object to any bill that would undermine prescriptive authority for naturopaths and place these professionals under the supervision of MDs in Hawaii. My naturopath has gone through four years of medical training and is perfectly capable of prescribing allopathic medications as well as naturopathic treatment modalities. In her practice, she has shown her abilities and her willingness to make referrals as needed. Physician's assistants and nurse practitioner, with fewer years of training, have prescriptive authority and it has worked out well -- providing a valuable alternative in our rural community. Please do not deprive us of our naturopath.

Thank you,

Susan Ince
Kapaau HI 96755

February 18, 2014

Dear Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

Clearly, there is a need for more understanding on the part of legislators to realize that naturopathic physicians have equal, if not more, potential to ENHANCE the well being of citizens' health with PROACTIVE & non-invasive methods, rather than using REACTIVE treatments and enabling DRUG CO-DEPENDENCY with complicating side effects as a standard practice. They are highly trained professions, who just like M.D.s, should be ALLOWED to practice their profession with respect & fairness. The only way to reduce the burden of rising healthcare costs & medical insurance is if we, as a nation, recognize that PREVENTATIVE MEDICINE, along with the benefits of proper nutrition & lifestyles comprise the most logical way to keep people HEALTHIER in the first place. Conventional medicine has its place, as does naturopathic & alternative care. Professionals on both sides should be allowed to practice according to their own training, specialize in areas they were trained in, and partner to benefit PATIENTS rather than profits or the drug industry. Let the PEOPLE then choose who & where to seek treatment and consultation from by the results they & others experience.

I'm writing to voice very strong objections to SB2577 SD1. The Legislature received well over 300 emails opposing SB2577, and only three in support, yet the Committee Report (SB2577 SD1 SSCR2244) seemed to ignore this, stating only that the committee "received testimony in opposition to this measure from Sakoda Construction, LLC, and several individuals." Why was a second hearing scheduled when there was such overwhelming opposition to this bill?

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There are so many problems with this bill that adequately describing them all would require dozens of pages of testimony. The following is a brief summary, beginning with its most egregious flaws.

First, this bill essentially proposes that naturopathic physicians, in order to continue qualifying for the prescription privileges the legislature wisely granted them (with overwhelming public support) years ago, would be required to have MDs "review" all of their prescriptions. According to the bill, these MDs would then "address any concerns" with these prescriptions, including the actual amounts prescribed, to the naturopathic physician and the board. This is worse than illogical, because:

1. The training of MDs does not at all qualify them for such a role. Allopathic education, compared to naturopathic education, has far fewer standards and requirements for training in the use of natural and preventive treatment modalities. SB2577 SD1 reflects a misunderstanding of, or a disregard for, what a naturopathic physician is. The entire point of naturopathic physician's education and training is to become a distinctly different type of medical expert than an MD - one who is highly educated in an alternative system of medicine that differs in many ways from that of conventional allopathic physicians. MDs are not equipped by their training to provide a meaningful review of naturopathic prescriptions, or have a comprehensive understanding of the complex issues they involve. (In an attempt to defend the bill, the Committee Report states that "naturopathic education differs from that received within allopathic or osteopathic medical schools." You cannot have it both ways; if the training is different, then it makes no sense for MDs to review naturopathic prescriptions.)

2. The extensive medical training of naturopathic physicians already more than qualifies them for their current prescription privileges.

3. Such a proposal is conspicuously one-sided and unfair. Is a corresponding requirement placed on MDs and other health care providers? Should MDs be required to have naturopathic physicians review and monitor all of their prescription activities, since the training of naturopathic physicians is much more extensive in many important areas (particularly those pertaining to a broad range of natural and preventive treatments) than that of MDs?

4. Appointing one type of physician to "oversee" another's jurisdiction raises all manner of legal and ethical concerns. It would be terrible public policy to require one kind of doctor to answer to another kind of doctor, trained in a different form of medicine, in order to simply maintain the prescription rights they were trained to have, especially when other types of doctors enjoy corresponding rights with no such requirement. Some have questioned whether a proposal of this kind may be unconstitutional and discriminatory. It would also be highly impractical, as it raises numerous dilemmas regarding patient rights, insurance issues, patient confidentiality, and more.

Second, this bill would require naturopathic physicians to submit monthly reports to the board detailing every single item they prescribe, and require the board to report this data to the legislature annually. Again, this is blatantly unfair, since no corresponding requirement is placed on other types of physicians. It is also impractical and cumbersome: it would place a completely unnecessary burden of paperwork on many of our most valuable primary care physicians - which Hawaii already has a shortage of. And SB2577 SD1 would further hinder the prescription process by requiring naturopathic physicians to receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item on their own formulary.

Last but not least objectionable, SB2577 SD1 would also place inappropriate and unreasonable limits on the naturopathic formulary by excluding such current prescription items as certain injectable medicines, vaccines, and medical oxygen.

There's no logical reason why naturopathic physicians should be singled out for any of the above-mentioned excesses of SB2577 SD1. To the contrary, since naturopathic physicians received prescriptive authority nearly five years ago, no evidence of patient harm regarding their

prescription rights has been brought to the board, and there has been no overuse of prescriptive authority and not one lawsuit filed in this regard. In addition, the public has benefited enormously as a result of the current prescriptive rights of naturopathic physicians; countless people have improved their health, and the public continues to overwhelmingly support those rights. Furthermore, in other states where naturopathic physicians have prescriptive rights there's no precedent for such restrictive requirements as those proposed in SB2577 SD1. In fact, the Hawaii board has already adopted standards of practice, care, competency, and safety for naturopathic physicians that are among the most rigorous in the nation. Hawaii's naturopathic physicians have even gone so far as to voluntarily recommend that they complete 15 hours of continuing education bi-annually in pharmacology. (By the way, this is the ONLY portion of SB2577 SD1 that is reasonable and should be proposed.)

SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. It would reverse many positive gains that naturopathic physicians have rightfully achieved, and by reducing the effectiveness of many of our very best primary care doctors, have numerous negative consequences for the people of Hawaii. Thank you for your consideration of my testimony in strong opposition to this bill.

Sincerely,
Cheryl Komenaka
Honolulu, HI

Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you oppose SB2577 SD1. This bill would restrict my naturopathic physician from being able to write prescriptions that are important in the health care of my family. Although naturopathic physicians try to minimize the use of prescription medications, in many cases they are essential to the practice of integrative family medicine.

There is no rational basis for this legislation. Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been:

- No complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians
- No cases of naturopathic physicians using prescriptions outside their training and scope of practice
- No overuse of prescriptive authority by naturopathic physicians
- No lawsuits filed in this regard

Instead, the vast majority of the testimony already submitted regarding SB2577 shows that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Suzanna Kinsey

SB2577

Submitted on: 2/19/2014

Testimony for CPN on Feb 20, 2014 10:30AM in Conference Room 229

Submitted By	Organization	Testifier Position	Present at Hearing
Sue Kinsey	Individual	Oppose	No

Comments:

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

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Caroline Pate
221 Pau Hana Rd.
Makawao, HI 96768

February 18 , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I would like to start by giving you a brief description of my most recent visits to my naturopathic physician. I was experiencing some numbness and tingling in my hands and feet, enough to concern and seek medical attention. "My doctor", a naturopathic doctor, asked several questions ranging from exercise, diet, lifestyle, etc. She started with body work of stretching, massage and slight adjustment. She also ordered a few blood tests. I had the blood work done, went home and returned 2 days later to get the results and her opinion. It turns out that after reviewing my blood tests, and diet...I had a bit higher level of sugar. WHY??? it was the heart of lilikoi season and was eating way way too many sugary lilikoi. I also had strayed away from my gluten free diet. I also had had a small boating accident that really kinked my neck and shoulder.....So with cutting way back on sugar, returning to my gluten free diet, the wonderful body work and prescribing Vit. B, my NATUROPATHIC DOCTOR's advice and work was exactly the cure!!

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no

precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. A naturopathic doctor's ability to write certain prescriptions when needed, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of health care.

Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these

prescriptions to the naturopathic physician and the board. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of naturopathic physicians far exceeds that of any MD in many areas essential to health care. Naturopathic doctors are highly educated, trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply.

Please oppose SB2577 SD1 and protect access to the high level of naturopathic care in Hawaii.

Thank you for your consideration.

Respectfully,

Jeannette Lyons, N.D.
4208 SW Pendleton Street
Portland, Oregon

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to
Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room
229

SB2577

Submitted on: 2/19/2014

Testimony for CPN on Feb 20, 2014 10:30AM in Conference Room 229

Submitted By	Organization	Testifier Position	Present at Hearing
Amelia Ensign	Individual	Oppose	No

Comments:

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

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Tom Parrish
PO Box 2773
Wailuku, Maui, Hawaii 96793

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

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I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Tom Parrish

Lauren Hara
2122 Lime St., Apt. 406
Honolulu, HI 96826

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs' review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from

naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Lauren Hara

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Dr. Margarethe McLeod, ND

1110 University Ave #304

Honolulu, HI 96826

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other-Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. I am a naturopathic doctor and my ability to write certain prescriptions when my patient's need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of providing unrestrictive and non-discriminative health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially, which I completely support. I know that many of us naturopathic physicians including myself utilize continuing education regardless of the current recommendations and I would love to include pharmacology into my CE.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. Requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more. I personally do not use my prescriptive rights as of yet, but in the future when my patient base is large enough for me to maintain a DEA number I shall need my whole scope of rights to best serve my patient base and maintain the integrity of their health.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Thank you for opposing SB2577 SD1 and protecting everyone's access to the high level of non-discriminatory care that they deserve.

Thank you,

Dr. Margarethe McLeod, ND

808.206.5559

www.naturallyoptimum.com

drmarnd@gmail.com

Dr. Jan Seibert, ND February 19, 2014 Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board.

There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority.

The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights.

Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board.

This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care.

Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law

to subordinate their expertise to individuals untrained in naturopathic medicine.

In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary.

In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians.

Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Jan Seibert, ND

Sent from Yahoo Mail for iPhone

Christopher Sy
1923 Fern Street I
Honolulu, HI 96826

February 19, 2014

Position: Strong Opposition to SB2577 SD1
Relating to Naturopathic Physicians

Hearing at 10:30am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection,

My wife has been sick her entire life. Since the age of 9 when she was diagnosed with hypothyroidism (having previously been admitted to the hospital nearly comatose), she has been under regular medical care from a medical doctor. Under an MD's care, at the age of 20, she was ordered off the necessary prescriptions and once again fell seriously ill and nearly died. Since "recovering" her life has continued to be a losing battle with symptoms such as exhaustion, poor mental function, and depression, all while an MD has slowly increased her level of medication to counteract her failing body.

I met her in the midst of this losing battle, a few years before she was recommended to her naturopathic doctor. I experienced firsthand the toll her poor health was taking on her quality of life and listened as well-meaning doctors said that was all they could do.

In the time since she started seeing her ND, visits which included detailed medical histories and tests, I have watched her health steadily improve to the point where she has been able to come off nearly all the medication she needed before. These were measurable results reaffirmed by tests taken before and after treatment. For her ND, it simply wasn't enough that my wife was not in imminent danger, her everyday health and well-being was the goal and she was willing to exhaust every possibility to make sure her quality of life was the best it could be.

This bill would drastically affect our NDs ability to provide care for my wife and would have an immediate and significant negative effect on her health and our lives. While I understand the need to protect the public from reckless individuals and abusive prescriptive practices, the thoroughness and professionalism my wife and I have experienced from our ND far exceeds that of nearly every medical doctor I have seen in my life.

I am the son of a medical doctor. My parents' friends are medical doctors and I grew up surrounded by medical doctors. I have the utmost respect and admiration for those who choose to devote themselves to that noble profession (I considered it for a long while). But it is simply a profession, a profession with a history and governed by a philosophy. Medical doctors do not hold exclusive nor divine right over care of the human body. Despite what they want you to think, there are good medical doctors and there are terrible medical doctors. There are good and

bad NDs as well. But they should be held accountable to the patient, the public, their peers and the ultimately the law, not to experts from another field.

While this law may affect only the small number of individuals who seek out care from an ND, it will most likely affect those lives significantly, my wife included. We intend on having a child soon and I honestly believe that given her previous state of health there was the significant possibility that we may not have been able to do so. I ask only, that in the absence of overwhelming evidence demonstrating that this law, these new restrictions, are of dire necessity, we allow a person's freedom to seek out the best care possible *for themselves*, remain their own.

Thank you for your time.

Respectfully,
Christopher Sy

From: Dr Karen Frangos, PT, ND

February 19, 2014

President, Hawaii Society of Naturopathic Physicians

P.O. Box 941

Kihei, HI 96753

Position: Strong opposition to SB 2577 SD1 relating to Naturopathic Physician prescribing rights

Hearing: 10:30 am, Feb 20, 2014 in Conference room 229

To: The Honorable Senator Rosalyn Baker, Chair, the Honorable Senator Brian Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection

Dear Senators,

I am Karen Frangos, PT, ND, President of the Hawaii Society of Naturopathic Physicians (HSNP), writing on behalf of HSNP in opposition to SB 2577 SD1, asking that you consider opposition, as well.

There have been no reported cases of harm regarding prescription medication since HI Naturopathic Doctors (NDs) were granted prescriptive authority on January 1, 2010, so this bill is, frankly, unnecessary.

This bill is also unreasonable by proposing that NDs be required to have Medical Doctors (MDs) review all of their prescriptions. NDs in HI are already regulated by our governor-appointed Board of Naturopathic Medicine, which is responsible for the development and proper utilization of the Naturopathic Formulary.

This bill also calls for limitations in ND prescriptive capacity by removing items from our formulary. HSNP insists that the current formulary remain intact with continued authority and oversight by the Board of Naturopathic Medicine.

The Board in HI has adopted higher standards for competence and safety for NDs than any other state in the country, so the HSNP feels that additional regulations are unwarranted, including the need for continuing education (CE) requirements. If, however, legislators agree that CE is required to help fulfill the Board's mission to assure high standards, the HSNP has already voluntarily recommended a requirement of fifteen (15) hours biennially of pharmacy-related CE to coincide with the biennial renewal of ND licenses.

Thank you for this opportunity to provide testimony and for your careful consideration.

Dr Karen Frangos

President, HSNP

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other

Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill is a solution looking for a problem as there is no evidence of harm from naturopathic doctors prescriptive authority in Hawaii or elsewhere. This bill will unduly harm the care that naturopathic physicians are able to provide to patients, and would be a step backwards for healthcare in Hawaii.

Sincerely,
Bernie Noe, ND
174 Elm St.
Montpelier, VT 05602

February , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard.

Instead, the public has benefitted greatly from this prescriptive authority.

The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights.

Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement

that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians.

Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Rainer Fischer
400 N Coronado St 3061
Chandler, AZ 85224

Shazia Khan
1923 Fern Street I
Honolulu, HI 96826

February 19, 2014

Position: Strong Opposition to SB2577 SD1
Relating to Naturopathic Physicians

Hearing at 10:30am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection,

I have been sick all my life. At two years of age I almost died as a result of severe leukopenia. At nine I was diagnosed with hypothyroidism only after being admitted to the hospital, nearly comatose. Testing for hypothyroidism at birth is standard practice in the US but I was born overseas and the test was never done. I was eventually sent to an endocrinologist who treated me every six months (standard protocol) for many years of my life all while battling symptoms such as learning impairment, depression, anxiety, exhaustion, temperature sensitivity, and memory issues. I battled these symptoms while being told by doctors that this was normal for someone in my condition and that there was nothing more they could do.

At twenty, my insurance changed and I was forced to switch doctors. No longer treated by a specialist I was told I was cured! (There is no cure for hypothyroidism by the way, it can simply be managed with varying degrees of success) Though I fought desperately with my medical doctor, I was taken off the meds I had been on my entire life, the meds necessary so my body could function, and within 12 weeks I was once again in the ER. My skin was gray, my glands severely swollen, and my period had persisted for nearly eight weeks. I have little memory of this time beyond this due to my failing thyroid. Upon learning of my condition the ER was able to restore my medication, and bring me back to "normal" after being nearly comatose once again.

The medical protocol for my condition never changed and I once again returned to the same sort of life I lived before, struggling with the same symptoms, muddling through: My closet, here in Hawaii, was filled with winter coats. Post-It notes littered the apartment reminding me to do even the most simple of tasks. Dozens of books laid unread or unfinished and a medicine cabinet filled with antidepressants did nothing to overcome the overwhelming exhaustion that clung to every day.

My naturopathic doctor (ND) changed all of that. I was, as many, skeptical at first. I was asked to fill out a very detailed medical history and thought that, at best, I would be told that I was properly medicated and that these symptoms are to be expected of someone

with my condition. But she actually listened, she took the time and she cared and thought that more could be done for me *beyond* what my MDs were prescribing me.

After extensive tests and careful monitoring, she was able to bit-by-bit, chunk-by-chunk, relieve *all my symptoms*. Throughout the process, consultation was constant and thorough records were kept of every treatment and test that was ordered. For the first time *in my life*, I feel healthy... But I am not *cured*. I still see my ND regularly to monitor my condition and the effectiveness or necessity of my treatments.

By taking a different approach, applying a different philosophy, my ND, in a relatively short period of time, has been able to manage my disease far more successfully than any medical physician in my entire life.

This bill threatens to impede her ability to do so and consequently what this committee decides will have an immediate impact on my health and everyday life. To restrict her ability to prescribe medication, to place her under the oversight of someone completely untrained in naturopathic would render her practically useless. More significantly it would greatly diminish the quality of life of the thousands of individuals, myself included, who have come to rely upon the care of an ND when their problems were either deemed unworthy or untreatable by a medical doctor.

Thank you for your time and I once again urge you not to allow this bill to pass.

Sincerely,
Shazia Khan

I have had a rare thyroid condition for many years that has been overlooked by my very caring Naturopath, Dr. Ann Marie Lambert, in Kealahou. . She is taking excellent care of me and is providing me with compound T3 that I use daily. It is her knowledge of how to treat this situation that I cannot find from any other health practitioner. She has saved my life as far as I am concerned. I would not be able to function normally in daily life if it wasn't for her knowledge and the T3 product that she has made in a compound in Portland.

A allopathic doctor does not normally deal with a severe reverse T3 situation. I am so happy to have Dr. Lambert assisting me with her expertise. Her work has improved my life. Please give her and all other Naturopaths the ability to work with pharmacy. These doctors are very knowledgeable. A necessary compliment to allopathic work.

Thank you,
Cathleen Rickard
Wailoua, HI

To All This May Concern:

Aloha, I oppose this bill for so many reasons that are at my core, and the essence that is Hawaiian and American. Let me explain:

I am proactive and smart and Naturopathic practices allow me to choose what fits. I rely on Western medicine as well as Naturopathic medicine. Having this choice allows me to responsibly allocate my resources to benefit my own health and the health of my extended family.

As a Licensed Practical Nurse, I am a member of the Medical Reserve Corps. Although I do not earn my living as a Nurse, I volunteer every year with the "Stop Flu at School" program on Oahu vaccinating school age children, and, adults. I agree with what works well for the common good. I have worked in the public health arena with many different populations and cultures, in many settings - youth, homeless, aging adults, pregnant women & children, infants, incapacitated, homebound, hospitalized, incarcerated, and, in a clinic setting. I believe this brings an objective, "main stream" perspective in my opposition to this Bill.

Who we are in these islands, indigenous, keiki o ka aina, or malahini: We marvel at nature's exquisite beauty and diversity here. We see the connectivity where the web of life is so evident. My family has been here for 100 years. My grandparents supported and promoted youth participation in sports in these islands. They did so because of the wholistic, intrinsic value to the individual and to the community. The native Hawaiians have their own "medicine". The cultures that live here bring their own "medicine". There are experts and that is their livelihood. What we all bring to the table heals us, body mind and spirit. We need all of these.

American: Freedom of Speech, Freedom of Religion, Free enterprise and marketplace. These things and the ideals they embody, this diversity and freedom make this country strong. It makes us who we are. It promotes innovation and fires our quest for perfection and creativity and excellence. It is healthy in principle and practice.

In my experience, trailblazers must be demonstrate, again and again, they have met muster and excelled above and beyond. With the Naturopaths I have sought care with, this is the case time and again. Why limit "medicine" to only part of the world's excellence, advancements and achievements?

If Hawaii is the healthiest state in our nation, who is it that wants to dampen the dynamic and brilliant flame, and for what reason?

'Oia'i'o aloha,

Vickie L. Fullard-Leo

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Krisel Nagallo
ND Candidate, Class of 2017
Southwest College of Naturopathic Medicine

Dr. Shanon Sidell
February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable
Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the
Senate Committee on Commerce and Consumer Protection:

I'm writing to express my opposition and request that you to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their role as primary care physicians. My ability to write certain prescriptions and to manage the medications my patients are on without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my practice.

My name is Shanon Sidell and I am a naturopathic physician. I would like to share with out why I see no basis for this bill, and every reason to oppose it.

There is no precedent anywhere in North America in which naturopathic physicians have prescriptive rights, for MDs to review NDs prescriptions. There have been no adverse incidences of prescribing by Hawaii naturopathic doctors since prescriptive rights were granted in 2009.

The training of naturopathic physicians prepares them for their prescriptive privileges through didactic and clinical rotations, and to be independent providers who consult with other health professionals when they it is appropriate for the patient, not when required by law to subordinate their expertise to other health care professionals untrained in naturopathic medicine.

Requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and more.

Hawaii's naturopathic physicians have a self-governing board as do all other licensed health care professionals. This board has even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

SB2577 SD1 would also require that naturopathic physicians submit detailed monthly reports of each item they prescribe to the board, that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and that certain prescription items important to many practices, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose may even be discriminatory, because no comparable requirements are placed on other types of physicians.

Please oppose SB2577 SD1 and preserve my right to practice within my profession, as I was trained.

Thank you,
Dr. Shanon Sidell
Licensed Naturopathic Physician
Licensed Acupuncturist

Office address:
68-1845 Waikoloa Rd, Suite 201
Waikoloa, Hawaii 96738

Mailing address:
PO Box 383194
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Facebook: Aloha Natural Health LLC
Twitter: @AlohaHealth

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Matthew Nelson
12 Stonegate Road
Hopkinton, MA 01748
mnelson@gmail.com

February 19, 2014

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other
Distinguished Members of the Senate Committee on Commerce and Consumer Protection

I am writing to express my opposition to SB2577 SD1. I was born and raised in Hawaii, have family still in the islands, and hope to move back someday, so I hope that this voice from the mainland can join the conversation. Naturopathic physicians provide a valuable healthcare option to support us in educated, healthy lifestyle choices. Having independent prescription rights is an essential part of that support, and must be preserved for naturopathic care to remain a viable practice.

Based on my reading of this bill and some of the reactions of the naturopathic healthcare community I cannot see where the rationale is for this bill. It would add unnecessary additional cost and time to treatment for all of us who choose naturopathic care, and unfairly puts naturopathic physicians in an inferior role where they must be watched over by allopathic physicians who have had different training and may not be familiar with naturopathic training. This should not become Hawaii's policy. Please do not pass this bill.

Thank you for your consideration.

Sincerely,

Matthew Kawika Nelson

Cosima Schaefer
408 N. Los Feliz Dr.
Chandler, AZ 85226

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

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There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they

have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

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If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Cosima Schaefer

Stephen Rickard, DC
65-1206 Mamalahoa Highway, Suite 3-12
Kamuela, HI 96743
808 887-1918

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other-Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

As a Chiropractic Physician licensed in the State of Hawaii, I wish to voice my strong opposition to SB 2577 SDI. We in the Chiropractic profession remember what professional discrimination feels like, and remember who was the source of that discrimination. Luckily, we do live in the United States and the Federal Supreme Court agreed with us.

This bill is ill-conceived, arrogant and unworkable. It is a weak guise to take control of another licensed, trained and qualified group of health-care providers.

I strongly urge you to oppose this bill.

Stephen Rickard, DC

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

As a current student of naturopathic medicine, I see a naturopathic physician (ND) for my primary care. Just recently she gave me a prescription for an insidious condition which was not ameliorated by lifestyle changes, diet changes, nor herbs. Naturopathic doctors are well trained in the Therapeutic Order: a unique philosophy that helps us know when to use gentler medicine like herbs and when prescriptions are necessary. Believe me, as naturopaths we use prescriptions as a last resort. But we also know when this is exactly what our patient needs, as in my recent case.

The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians. If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of

our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Elizabeth Anderson, M.A. Ed
AzNMA Board of Directors student rep
Candidate for NMD 2015

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians
February 19, 2014

3427 E. Rosa Lane
Gilbert Az 85297
480-720-3118

Good Morning;

I am writing in extreme opposition to SB2577 SD1. Naturopathic practitioners (ND) play a vital role in our healthcare community and depriving them of their autonomy and prescriptive authority would be detrimental to our community.

Hawaii is one of the few states that allows NDs prescriptive authority and practicing autonomy. Requiring oversight by allopathic physicians would only increase the cost and bureaucracy for NDs to practice and make it even more difficult for them to provide the necessary services people require.

I am trained in allopathic medicine but understand that "Western medicine" has its limitations. Naturopathic training is allopathic plus nutrition, prevention, lifestyle, etc. Now more than ever, we are shifting our focus in medicine from reaction to prevention, and who better to aide in this shift than the NDs. I believe that naturopathic and allopathic can and should work synergistically.

Please do not limit the ability of naturopathic doctors to provide much needed care to our community.

Thank you for receiving this testimony.

Sincerely,

Jessica Sage Blank
(Mobile Intensive Care Technician, PA-Student)
808.276.6619
toblank@uw.edu

Hearing Date: 2-20-14 10:30am Rm 229

IN OPPOSITION

To the Honorable Senator Rosalyn H. Baker, Chair the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

Good Morning,

I write to ask that you please oppose SB2577 SD1. This bill would limit the prescriptions that can be written by my Naturopathic physician. These medications are in many cases essential to the practice of integrative medicine.

I do not see a reason to legislate Naturopathic doctors at this time. Naturopathic physicians receive excellent training and obtain sufficient preparation for the writing of prescription medication as well as all other services currently provided. Naturopathic physicians have Board oversight. The Hawaii Naturopathic board has set some of the highest standards in the United States for quality health care. Hawaii Naturopathic physicians have voluntarily recommended that they complete 15 hours of continuing education in pharmacology twice a year.

This bill makes it lawful to invade my privacy as a patient of a Naturopathic doctor because it requires another party to oversee what my doctor might prescribe me.

Requiring an MD to oversee what an ND prescribes does not make sense. An MD is trained differently in patient care than an ND. If I choose a Naturopathic physician for the care of my health, it is precisely because of their training. The education of my Naturopathic doctor far exceeds that of an MD in many areas pertaining to my health care. An MD is not trained in Naturopathic treatment modalities so they cannot be expected to make sensible reviews of Naturopathic prescriptions.

SB2577 SD1 is also placing unnecessary burdens on Naturopathic physicians with its outlined requirements. Some of these are that they submit monthly reports to the board of all the items prescribed, the requirement that they get authorization of from the Department of Commerce and Consumer Affairs in order to prescribe items from their own formulary.

The quality of care given by my primary care provider would be reduced if the bill passes. The bill is reducing ND's effectiveness as physicians because of the requirement that some prescription items be removed from their Naturopathic formulary, such as medical oxygen, injectable medicines and vaccines. I have needed a vaccine in the past. And I would like to still count on the fact that my doctor of choice, who already has these privileges, can continue to provide me with a vaccine should I need it.

Don't turn back the clock on the prescriptive abilities of our state's Naturopathic physicians. Leave the people of Hawaii the high standard of care that we expect from our primary health providers. Please oppose this bill and protect my access to the high level of naturopathic care that I deserve.

I thank you for your consideration and for your time.

Sincerely,
Rocio Bueno

Shelley Vecchitto
46-1058 Emepela Way
Unit 10R
Kaneohe, HI 96744

February 19, 2014

Position of Testimony: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

The hearing for this measure is at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Members of the Senate Committee on Commerce and Consumer Protection:

I hope that you will do everything you can to oppose SB2577 SD1. This bill would require naturopathic physicians to reduce or give up prescription rights that are necessary to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the inappropriate restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Shelley Vecchitto

Ivan Quintero
14500 Juanita Dr. NE Kenmore, Washington
February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the
Senate Committee on Commerce and Consumer Protection:

I'm writing to express my opposition and request that you to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them and to manage the medications I am on without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no basis for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

The experience I have had with my naturopathic physician (ND) has been nothing but wonderful. I have not felt more heard or taken care of than when seeing my ND. The level of healthcare provided is up and above that which I have experienced with other healthcare providers. I do see this reamendment as an added burden to ND's which are already under appreciated and criticized.

Thank you,
Ivan Quintero.

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

Senator Baker,

I met you awhile back at a few women's luncheons and with Betty Sakamoto at a Hale Makua Fundraiser. Since meeting you I have moved back to Arizona to go to naturopath school. We still own our house in Maui and visit often. My intension is to move back to Maui and set up practice. I opened a wellness center on Lower Honokawai Rd several years ago and that inspired me to go to medical school. I hope to open another one. If this bill passes I doubt I will. Thus, I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to our services. One of our greatest assets is our ability to treat diabetes. Without prescription rights or with having to get approval from an MD not trained in diabetes, this would create a detriment to the patient's health. We are trained to balance prescription drugs with natural healing methods. Our methods help reduce the amounts of medications patients need if not completely get them off of prescription drugs. WE KNOW WHAT WE ARE DOING!

In two years I will be a naturopathic doctor. I plan on moving back to Maui, Hawaii, and provide much needed health care there. Right now there are chiropractors with **NO pharmacology training, let alone no naturopathic training** treating patients with compounded formulas and herbs which means they are practicing outside their scope of medicine. We need more naturopaths on Hawaii so patients who want to seek natural alternatives can go to a properly trained doctor, not a chiropractor. This bill will discourage naturopaths to come to Hawaii.

I know three other students who are planning on moving to Hawaii to practice naturopathic medicine. IF this bill passes Hawaii will be losing some highly trained doctors who will use the beautiful gifts of nature that Hawaii boasts a strong connection. At my college, Southwest College of Naturopathic Medicine, we take the same amount of pharmacology hours as allopathic medical students who attend Harvard or Yale medical school. We also are required to take yearly continuing education classes in pharmacology (see below). We, nationally licensed naturopaths, have the same standards of education as any other medical doctor in pharmacology! We take the same amount of medical classes on top of being trained in botanicals, Chinese medicine, physical medicine, IV and injectables, minor surgery, mind/body training, and homeopathy. We graduate with MORE hours in medical training than allopathic medical students!

Naturopaths need the ability to write certain prescriptions when our patients need them, without the unreasonable restrictions proposed by SB2577 SD1. It is an important part of my practice to provide appropriate health care. When we see patients, a lot of them, at first, are on many prescription drugs. As we improve their health, we try to wean them off of as many unnecessary medications but in the mean time we need to be able to write them their prescriptions to support their healing process.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, **there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority.**

The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. **The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights.** Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. **A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities.**

My education as a naturopathic physician far exceeds that of any MD in many areas essential to my patient's health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, **not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type**

of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. **Please oppose SB2577 SD1 and protect Hawaiian's access to the high level of naturopathic care they deserve.**

Thank you,

Laura Markison

100 Ala Hoku Place
Lahaina, HI 96761
808-283-8769

and

1711 E. Lockwood St.
Mesa, AZ 96761

SB2577

Submitted on: 2/18/2014

Testimony for CPN on Feb 20, 2014 10:30AM in Conference Room 229

Submitted By	Organization	Testifier Position	Present at Hearing
James Klicpera	Individual	Oppose	No

Comments: February 18 , 2014 Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection: I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care. There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially. One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to

individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more. SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians. If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve. Thank you, James Klicpera, MA

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

Do not reply to this email. This inbox is not monitored. For assistance please email webmaster@capitol.hawaii.gov

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require

naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577

SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's

naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient

harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of

prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one

lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of

naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer

all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of

naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where

naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest

standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians

have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in

pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs

review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they

have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A

naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all

equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for

training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of

any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers

who consult with other health professionals when they consider it appropriate for the patient, not when required by law to

subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to

oversee and review a very different type of doctor's practice would create endless implementation and legal problems

when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary,

inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly

reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of

Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that

certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from

the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may

even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from

naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most

valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need

is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and

protect my access to the high level of naturopathic care that I deserve.

Thank you,

Dr. Kimberly Otis
Evergreen Natural Healthcare
11903 NE 128th Street, Suite B
Kirkland, WA 98034
Phone: 425.825.8088
Fax: 425.825.1406

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Dr. Alysa Nguyen, ND, LAc

239 Laurel Street, Suite 102

San Diego, Ca 92101

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to the services that I would provide. I am a Naturopathic doctor from the State of California and I have a Naturopathic license in Hawaii as well. I intend to move back to Hawaii this summer. This law would greatly limit my ability to care for those seeking my help and would not allow me to practice as I was trained.

The new bill that is proposed in Hawaii that a medical doctor is required to review all prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician is comparable to a medical doctor and there are certain subjects that I pursue more continuing education on. To have a MD oversee and review my prescriptions would be impossible because we are different types of doctors. This would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other

states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of naturopathic doctors as primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my right to practice Naturopathic medicine as currently allowed by the law.

Thank you,

Sincerely,

--

Dr. Alysa Nguyen, ND, LAc
Naturopathic Doctor, Licensed Acupuncturist
Inner Harmony Integrative Health
office phone: 619-564-4319
www.DrAlysa.com

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February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the
Senate Committee on Commerce and Consumer Protection:

Aloha Kakou,

My name is Kealaponu Richardson. I was born in Honolulu, relocated to Seattle, WA where I lived until I completed my undergraduate studies at the University of Washington, then moved back to Hawai'i in 2012. I am writing you this letter today because of a deeper feeling I know I must voice to those involved. Not only are the restrictions proposed by SB2577 SD1 unreasonable, SB2577 SD1 would significantly hinder the practice of naturopaths (NDs) that we need to preserve and encourage as an integral part of the healing to be done in Hawai'i.

During my time in Seattle, WA I surrounded myself with respected professors at the U of W and also of those in the naturopathic community. Fortunately Bastyr University, one of the top naturopathic schools in North America, is located right outside of Seattle. This meant I had a plethora of NDs to study with and understand their approaches to healing. Most notably I managed a natural dispensary for an integrative medical office of dually licensed practitioners—NDs and LAc (licensed acupuncturists). In Washington State, NDs are recognized as Primary Care Providers (PCP) and by law insurance companies who operate out of Washington state must offer insurance coverage for alternative care providers as well as for conventional medical providers. NDs are also able to obtain Federal DEA license and have a large spectrum of prescriptive rights. I observed the ability for NDs to integrate care for patients with other medical providers as well as manage care on their own. Seattle is a great place because of the openness to forward thinking that the people, government, and companies share with the naturopathic community. NDs are accepted as a part of the medical community and people have freedom to choose their PCP.

When I moved to Hawai'i in 2012, I arrived with a career as a representative for a natural biotech company which produces prescription medical foods. In beginning my work here I was absolutely shocked at the laws and lack of coverage that NDs are given in the state of Hawai'i. I could not believe that NDs were not a covered benefit in almost all insurance plans, that they are restricted from obtaining Federal DEA licenses, that their scope of practice was limited, and most upsetting the schism between the ND community and the general medical community. I did not understand, still don't understand, why we are focused on continuously dividing the groups rather than focused on allowing both to exist in harmony and when necessary integrate.

Coming from a place where NDs did not have to rebut their practice, the mere unreasonable propositions of SB2577 SD1 leaves me flabbergasted. This deep feeling I have comes from a place of pono, which encourages the harmony of diversity. This harmony of diversity is of utmost importance in today's state of healing the imbalanced in our beautiful state of Hawai'i. And naturopaths are a beneficial asset that we need to preserve and encourage as an integral part of the healing to be done in Hawai'i.

Please oppose SB2577 SD1 and protect Hawai'i's access to the high level of naturopathic care.

Mahalo for your time and consideration,

Kealaponu Richardson

Alice Nguyen
3648 Millikin Ave
San Diego, CA 92122

February 17, 2014

Position of Testimony: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

The hearing for this measure is at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T.

Taniguchi, Vice Chair, and other Members of the Senate Committee on Commerce and Consumer Protection:

I hope that you will do everything you can to oppose SB2577 SD1. This bill would require naturopathic physicians to reduce or give up prescription rights that are necessary to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the inappropriate restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements

in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board.

This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care.

Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen,

and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Respectfully,

Alice Nguyen

Naturopathic Medicine Doctoral Candidate 2016

BASTYR UNIVERSITY CALIFORNIA


4106 Sorrento Valley Boulevard

San Diego, CA 92121

e-mail: alice.nguyen@bastyr.edu

cell: 424.270.4361

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:



I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs

review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you
Margaret E. Brevoort
P.O. Box 1200
Kapaau, HI 96755

--

Please note my new email: peggbre@gmail.com

Peggy Brevoort

P.O. Box 1200

Kapaau, HI 96755

808-889-6930 home

206-310-0139 cell

www.brevoortproperties.com

To: Senator Rosalyn H. Baker, Chair
Senator Brian T. Taniguchi, Vice Chair
Committee on Commerce and Consumer Protection:

From: Fawn Jade Koopman

Re: Testimony in opposition of SB2577 SD1

Hearing: Thursday, February 20, 2014, 10:30AM
State Capitol, Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing in strong opposition to SB2577 SD1, Relating to Naturopathic Physicians. This bill would restrict my naturopathic physician from being able to write prescriptions that are important in the health care of my family. Although naturopathic physicians try to minimize the use of prescription medications, in many cases they are essential to the practice of integrative family medicine.

Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been: no complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians, no cases of naturopathic physicians using prescriptions outside their training and scope of practice, and no overuse of prescriptive authority by naturopathic physicians.

Instead, the vast majority of the testimony reveals that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board which provides oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii Naturopathic Board has set some of the highest standards in the United States for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have voluntarily recommended that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have M.D.'s review all of their prescriptions, and that these M.D.'s would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an M.D. With all due respect, M.D.'s are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary.

This legislation undermines the high standards that the people of Hawaii have come to expect from naturopathic physicians. It also reduces the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians.

For these reasons I respectfully urge the Committee not to pass SB2577 SD1.

Thank you for the opportunity to testify,

Fawn Jade Koopman

Your Name /Address
February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable
Verena Giesser
PO Box 383194
Waikoloa, HI 96738

To
Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the
Senate Committee on Commerce and Consumer Protection:

I'm writing in strong opposition of SB2577 SD1. My naturopathic doctor's ability to write certain prescriptions when I need them and to manage the medications I am on without the unreasonable restrictions proposed by this bill, is an important part of my health care.

There's no basis for this bill, and every reason to oppose it.

There is no precedent anywhere in North America in which naturopathic physicians have prescriptive rights, for MDs to review NDs' prescriptions.

The thorough and rigorous training of naturopathic physicians prepares them to be independent providers. There have been no adverse incidences of prescribing by Hawaii naturopathic doctors since prescriptive rights were granted in 2009. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

Besides all this, this bill would simply impose even more hardship and obstacles to patients in a state where there is already a shortage of health care providers.

Thank you for your consideration,
Sincerely,
Verena Giesser

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you oppose SB2577 SD1. This bill would restrict my naturopathic physician from being able to write prescriptions that are important in the health care of my family. Although naturopathic physicians try to minimize the use of prescription medications, in many cases they are essential to the practice of integrative family medicine.

I am a Single Parent of a 7-year old son who was diagnosed with ADHD early last year. I was referred to a Naturopathic Doctor in the Fall of 2013 and therefore, my "journey" with my son & his new doctor has just begun. And although, it was been quite a huge struggle financially since my son's Naturopathic doctor's services are not covered by our health insurance; I can honestly say that through the prescriptions, supplements, therapies, etc. that my son's new doctor has presented to us; I was able to see a remarkable difference within the first MONTH my son was introduced to these various homeopathic therapies. As a mother of a young child who is desperately trying to find ways to help her son deal with his disorder without the aid of "drugs"; the option of using naturopathic therapies is **CRUCIAL** and one in which my intention is to continue for the overall best interest of my son's health & well-being.

There is no rational basis for this legislation. Since the Legislature authorized prescriptive rights for Hawaii's naturopathic physicians, there have been:

- No complaints brought to the Hawaii State Naturopathic Board regarding prescriptive use by naturopathic physicians
- No cases of naturopathic physicians using prescriptions outside their training and scope of practice
- No overuse of prescriptive authority by naturopathic physicians
- No lawsuits filed in this regard

Instead, the vast majority of the testimony already submitted regarding SB2577 shows that the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other

unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect our access to the high level of naturopathic care that MY SON so richly deserves!

Most respectfully yours,
Cyril I. Leister

Cynthia Henzler Blok
Palehua Rd, Makakilo, HI 96707

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other-Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be

independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you.
Cynthia Henzler Blok

Sharon Keith
2165-a 10th Avenue
Honolulu, HI 96816

February 19 , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

Aloha,

Sharon Keith

Sharon Keith, BSN, MPH, RN, BC
Instructor, Clinical Education
TC Coordinator for QMC American Heart Asso.Training Center
OFFICE: 808-691-7525
FAX: 808-691-7763
The Queen's Medical Center
1301 Punchbowl Street
Honolulu, HI 96813

Darlene W Lee
692 Orchid Lane
Del Mar, CA 92014
darlene.lee@bastyr.edu

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable
Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the
Senate Committee on Commerce and Consumer Protection:

I'm writing to express my opposition and request that you to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them and to manage the medications I am on without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no basis for this bill, and every reason to oppose it.

There is no precedent anywhere in North America in which naturopathic physicians have prescriptive rights, for MDs to review NDs prescriptions.

There have been no adverse incidences of prescribing by Hawaii naturopathic doctors since prescriptive rights were granted in 2009.

The training of naturopathic physicians prepares them to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine.

Requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and more.

Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

SB2577 SD1 would also require that naturopathic physicians submit detailed monthly reports of each item they prescribe to the board, that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Darlene W Lee

Aubrey Anderson
5516 Fredonia St.
San Diego, CA 92105

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the
Senate Committee on Commerce and Consumer Protection:

I grew up in Hanale'i on the north shore of Kaua'i and am a naturopathic medical student at Bastyr University, CA. The health and wellbeing of my ohana is why I have chosen to become a naturopathic doctor. When I graduate I plan to return home so I can care for my family and friends in the great state of Hawai'i. I am devoted to the health of the people in my home and am alarmed by SB2577 SD1, and what it means for access to naturopathic medical care.

I'm writing to express my opposition and request that you to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them and to manage the medications I am on without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no basis for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefited greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I, and all the people of Hawai'i deserve.

Thank you,

Aubrey Anderson
ND Medical Student
Bastyr University, San Diego, CA
aubrey.anderson@bastyr.edu

Dr. Shanon Sidell
Licensed Naturopathic Physician
Licensed Acupuncturist

Office address:
68-1845 Waikoloa Rd, Suite 201
Waikoloa, Hawaii 96738

Mailing address:
PO Box 383194
Waikoloa, Hawaii 96738

808-960-8333 (phone)
877-992-6761 (fax)

www.ShanonSidellND.com
Facebook: Aloha Natural Health LLC
Twitter: @AlohaHealth

I feel bill sb2577 sd1 is a very bad bill with out a good reason to have been written except special interest.

I have had a health issue for 25 years that I tried all kinds of Dr. I could find including the Dr. Of the year in Hawaii. I did not get any results until I went to a Naturopathic Dr.. I am afraid that a bill like this could affect the methods that a Naturopathic Dr can use. Please do not pass this bad bill.

Sent from my iPhonePatrick Patton. (808)639-0570

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My ability and my colleague's ability as naturopathic physicians to write certain prescriptions when needed, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of the general public's access to health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

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Thank you,
Dr. Lauren Tessier
Naturopathic Physician & Primary Care Provider
46 South Main St #2
Waterbury, VT
05676

802.560.5594
www.DrLaurenTessier.com

Confidentiality Notice: This communication and any files or attachments transmitted with it may contain information that is confidential, privileged and exempt from disclosure under applicable law. It is intended solely for the use of the individual or the entity to which it is addressed. If you are not the intended recipient, you are hereby notified that any use, dissemination, or copying of this communication is prohibited by federal law. If you have received this communication in error, please destroy it and notify the sender.

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
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Thank you,
Victoria Nguyen

Gloria Badillo, ND
826 N Mullan Rd, Ste A
Spokane Valley WA 99206

February , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other

Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

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If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Gloria E. Badillo, N.D.

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the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the
Senate Committee on Commerce and Consumer Protection:

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Thank you,

Andrea Schneider

Allaine Kelly
949 Kawaiki Place
Honolulu, Hawaii 96825

February 19, 2014

To Senator Rosalyn H. Baker, Chair, Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I am writing to voice **very strong objections to SB2577 SD1**. Knowing that over 300 emails opposing this bill were received and only 3 in support seems pretty clear that patients of Naturopathic Physicians feel very strongly about their doctors' skills and qualifications.

My personal experience has been very positive, and have found over the years that N.D.'s are extremely well trained and dedicated professionals. Taking away their prescription privileges is illogical because they do not write a prescription randomly; first and foremost the objective is to help the body heal naturally and a prescription drug is the last choice.

There are many other reasons this bill should go away, and I know you have heard from a lot of people voicing those reasons so I will keep this short.

Thank you for your consideration on this matter,

Allaine Kelly

To the Honorable Senator Rosalyn H. Baker, Chair,
the Honorable Senator Brian T. Taniguchi, Vice Chair,
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Thank you,

-Kalin Suzuki

Charles F Garver

P.O.Box 210

Honaunau. Hi 96726

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to
Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room
229

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Honorable Senator Brian T. Taniguchi, Vice Chair, and other
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Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Charles F Garver

To Whom It May Concern,

A bill has been passed by the Hawaii Senate Health Committee that could seriously undermine your access to quality naturopathic care. The bill, SB2577 SD1, would take away many of the rights gained in 2009 when several hundred patients submitted emails to lawmakers in support of efforts to improve Hawaii's naturopathic law. This overwhelming response played a crucial role in changing the law, and now you can take action again to protect your rights to naturopathic care.

How the proposed bill could affect you: SB2577 SD1 would hinder the practice of naturopathic medicine in numerous ways, preventing or impeding your naturopathic doctor's ability to write many prescriptions, and depriving you of other naturopathic care options that you currently have. This bill would also drastically change your personal relationship with your naturopathic physician by removing your right to have your naturopathic care be a private matter between just you and your doctor. It would require your naturopathic doctor to have an MD "oversee" your naturopathic care, including even the specific doses of your personal naturopathic prescriptions. This bill could even destroy your relationship with your doctor altogether, because the requirements in SB2577 SD1 are so draconian that some naturopathic physicians could feel compelled to leave Hawaii if the bill passes.

Your help is urgently needed to stop this bill and preserve your rights to the kind of naturopathic health care you deserve. Here's how you can take action and make a huge difference: please email messages opposing this bill to legislators at the address below. You can copy and paste the sample message that follows into an email. Add your name and address (and your name at the bottom), enter Oppose SB2577 SD1 in the subject line, and send. For maximum effect, please modify and personalize the message - for example, add a story that shows how naturopathic medicine has helped you and why we need to expand, not shrink, the prescription abilities of naturopathic doctors. The sooner you send your message, the better.

The deadline for sending your messages is 10:30 am this Wednesday, February 19th (24 hours prior to the bill's hearing). If you are receiving this email after the deadline, there's no urgent need to send a message, as decision-making on this bill will occur at the hearing. However, messages sent after the deadline but prior to the hearing are still included on the website as late testimony.

Please let all your relatives and friends know about the damage this bill could do to your health care options, and rally their support to help us fight it. Forward this message to everyone you know, and ask them to spread the word and submit messages too. You don't need to be a Hawaii resident to make a difference; if people in other states submit emails, it will definitely help. We can't overstate the importance of getting as many people as possible to join you in sending messages opposing this bill. The future of your access to quality naturopathic care is at stake.

Thank you for whatever you can do to help!

Sincerely,

Kevin Edwards

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

I sustained a complex fracture in a bone in my foot last May and because of the care I received from my naturopathic physician I did not require invasive surgery and my bone is healing strong. I just was able to run in the Great Aloha Run on Monday and it felt great! I felt my ND cared much more than my doctors at Kaiser and I preferred her care and advice over my Kaiser doctors to help heal my foot injury. Whereas my doctor at Kaiser just gave me a script for Ibuprofen and told me to rest, my ND talked with me about ways to help my body heal my broken bone through herbal based injections, diet and nutrition, exercise, and lifestyle changes that have resonated throughout my life and helped me live a more healthy lifestyle.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Mackenzie M Manning
Biology Instructor
Math Science Dept. Kalia 101
Kapi'olani Community College
4303 Diamond Head Rd
Honolulu, HI. 96816
Ph: 808 734-9437
Fax: 808 734-9151

Marci Peterhans
82-6169 Kololeke Place
Captain Cook, HI 96704

February 19 , 2014

Position: Strong Opposition to SB2577 SD1 Relating to
Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room
229

To the Honorable Senator Rosalyn H. Baker, Chair, the
Honorable Senator Brian T. Taniguchi, Vice Chair, and other
Distinguished Members of the Senate Committee on Commerce
and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic

physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

SB2577 SD1 requires your Naturopathic Physician to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their

own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If SB2577 SD1 is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians.

Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
YOUR NAME HERE

Brigitta Mason
91-1123 Waihoano St.
Ewa Beach, HI. 96706

Feb. 17, 2014

Position: Strong Opposition to SB2577 SD1 relating to Naturopathic Physicians
Hearing @ 10:30 am Feb. 20, 2014 Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, The Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members:

I am writing you to voice my strong opposition to SB2577 SD1. This bill would require naturopathic physicians to restrict or give up their prescription rights, which are essential to their services. Since the Legislature granted naturopaths prescriptive rights five years ago, there has been no evidence whatsoever of patient harm. My question posed to you is why are we restricting their prescription rights? From what I have learned naturopaths must undergo extensive training and education as well as adhere to a very high standard set by the Hawaii Naturopathic Board. As a citizen of this state I find this bill offensive to my healthcare rights, as well as extremely illogical.

As a patient who fully endorses a holistic approach to health as my first option to healing, this bill would greatly reduce my choices as well as force me to seek all of my healthcare from a M.D. With all due respect to the M.D.'s it has been my experience that although M.D.'s are very knowledgeable in allopathic medicine, they know very little about natural hormones, nutrition, and holistic health in general. If this bill passes naturopaths will be required to be overseen by an M.D. That makes about as much sense as a carpenter overseeing an electrician. These are two very different areas of expertise as well as approaches to health.

It is my opinion that if we are concerned about harm being done to patients perhaps we need to look in a different direction. The incredible overuse of pharmaceuticals in this country is staggering and shameful. Young children being handed out prozac like candy, and our elderly being drugged to oblivion is downright disgusting. It was just a couple of months ago that a dentist in Kailua allegedly over-sedated a young three year old girl so she could perform 4 root canals on her milk teeth. Now that is criminal! Where was the oversight in that? Should we bring down a whole island of

dentists because of this incident?

As a citizen of this country and a wife of a serviceman who has been to 3 tours in Iraq and Afghanistan, I urge you to allow us to choose who we feel comfortable with prescribing us medicine and attending to our healthcare needs. From my research naturopaths are more than qualified to prescribe medications. They are also the ones least likely to abuse prescription rights, since they conform to a holistic and natural approach to healing the body.

Thank you for your time,

Brigitta Mason

Koren Barrett ND

1831 Orange Ave ste A

Costa Mesa

92627

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient,

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If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,

Koren Barrett ND

SB2577

Submitted on: 2/19/2014

Testimony for CPN on Feb 20, 2014 10:30AM in Conference Room 229

Submitted By	Organization	Testifier Position	Present at Hearing
Suzanne Wakelin	Individual	Oppose	No

Comments:

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

Do not reply to this email. This inbox is not monitored. For assistance please email webmaster@capitol.hawaii.gov

James Pescatore

February , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

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naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
James Pescatore

Niki Rarig
1714 SE 59th Ave
Portland, OR 97215

February , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair,
and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

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have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

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If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most

valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Niki Rarig

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Niki Rarig
National College of Natural Medicine
Naturopathic Medicine and Classical Chinese Medicine
Class of 2015

Merle Kawabata
1550 Wilder Ave., #B403
Honolulu, HI 96822

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I am writing to ask that you strongly oppose SB2577 SD1 relating to Naturopathic Physicians. Naturopathic Physicians will be undermined if this bill is not stopped. Naturopathic Physicians have long proven to be effective doctors as there has been no evidence of harming anyone with regards to writing prescriptions for their patients. So, it does not make sense for an MD to oversee Naturopathic Physicians when prescribing medication.

Also the practices of Naturopathic Physicians and Medical Doctors are so different. How is it possible for the Medical Doctor to oversee prescribing medication for Naturopathic patients when Medical Doctors have no training in Naturopathic treatments?

I feel that my rights as a patient will also be infringed upon if this bill is not stopped because I do not think that I will be treated properly if a Medical Doctor has to oversee Naturopathic Physicians. I want to be able to go to a Naturopathic Physician and be treated with naturopathic remedies without the interference of a Medical Doctor. If I wanted to see a Medical Doctor, I would have that right to do so. And if I want to continue seeing a Naturopathic Physician I feel that I have a right to do so too, without feeling that my health is being compromised.

Please do not let the rights of Naturopathic Physicians be infringed upon. Also, the patients of Naturopathic Physicians would not get the ultimate treatment and care that they so rightly deserves if this bill is not stopped. Please oppose SB2577SD1 so that Naturopathic Physicians can freely treat their patients without the overseer of Medical Doctors.

Thank you.

Merle Kawabata

Michelle Suber, ND
65-1235 A Opelo Road #5
Kamuela, HI 96743

February 19 , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic
Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H.
Baker<http://clicks.aweber.com/y/ct/?l=NBDvZ&m=JqI28kFP2wD0a8&b=IU0_SDa7gFZssY_UM1RJg>,
Chair, the Honorable Senator Brian T.
Taniguchi<http://clicks.aweber.com/y/ct/?l=NBDvZ&m=JqI28kFP2wD0a8&b=4YRLCIJGT_Bm2d_oxjRKQQ>,
Vice Chair, and other Distinguished Members of the Senate Committee on Commerce
and Consumer
Protection<http://clicks.aweber.com/y/ct/?l=NBDvZ&m=JqI28kFP2wD0a8&b=dETE_5eUn59CFW9JoeQZug>
:

I've been in private practice in Hawaii since 1998 and currently work with both an MD and PA.

I'm writing to request that you do everything in your power to oppose
SB2577 SD1. *This bill would essentially require naturopathic physicians to
restrict or give up prescription rights that are essential to their
services. My ability to write certain prescriptions
when I need them, without the unreasonable restrictions proposed by SB2577
SD1, is vital part of caring for my patients.

*Since the Legislature rightfully granted Hawaii's naturopathic

physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. Our sufficiently prepares us for prescription privileges, and we are qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

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*If **SB2577 SD1** is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. *It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians.

Please oppose SB2577 SD1 and protect patient access to the high level of naturopathic care that they deserve.

Thank you,
Michelle Suber, ND

Micaela Finlayson, ND 301

27001 La Paz Rd, Ste 292

Mission Viejo, CA 92691

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other

Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require

naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic

doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577

SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's

naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient

harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of

prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one

lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of

naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer

all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined.

Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of

naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where

naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest

standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians

have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in

pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs

review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they

have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A

naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all

equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for

training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of

any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers

who consult with other health professionals when they consider it appropriate for the patient, not when required by law to

subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to

oversee and review a very different type of doctor's practice would create endless implementation and legal problems

when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary,

inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly

reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of

Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that

certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from

the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may

even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from

naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most

valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need

is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and

protect my access to the high level of naturopathic care that I deserve.

Thank you,

Micaela Finlayson

Ime Beltran/ 597 Pohai Street, Kahului MAUI

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

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There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a licensed physician and should be allotted the rights of delivering care according to the guidelines of licensure.

Thank you for hearing and honoring my testimony,

Sincerely,

IME BELTRAN

Testimony against SB2577 SD1

Sent from my iPad

Begin forwarded message:

From: caplanhumd <caplanhumd@massmed.org>
Date: February 18, 2014, 11:15:48 PM HST
To: "CPNtestimony@capitol.hawaii.gov" <CPNtestimony@capitol.hawaii.gov>
Cc: Donna Caplan <dr.donna4health@gmail.com>
Subject: CPN testimony

Mahalo for affording me the opportunity to provide comment and testimony on the matter of prescribing by naturopathic physicians in Hawaii.

By way of introduction I am a Board Certified internist and rheumatologist who has practiced for 52 years in Massachusetts. I have served on the Board of Trustees of the Massachusetts Medical Society for many years and am a professor (clinical) of medicine at Tufts.

I own property in Kilauea, Kauai where I am currently on vacation.

I wish to focus my comments regarding this bill on the involvement and responsibility it places directly on M.D. (and other degreed) physicians licensed in Hawaii to undertake "collegial" relationships with naturopathic doctors for the purpose of monitoring (and presumably at some point reporting on such practice.

This puts a tremendous burden in terms of responsibility, special postgraduate educational effort (since medical doctors are not educated in trained in or familiar with the naturopathic formulary, pharmacology and practices), significant liability concerns, time to be taken from there already full working schedules, etc.

I submit that while I find this bill otherwise unneeded, poorly focused and unnecessary relative to the licensed naturopaths of Hawaii who must be graduates of one of the five fully accredited US and two in Canada, the proposed direct role in this process is a flawed concept which will make the bill unworkable as it will be decisive at a time when the care of our patients must be inclusive and place untenable burdens on the Hawaiian medical doctors.

Finally, it is critical that this entire matter be reviewed by the Hawaiian State Medical Society and the Board of Registration/ Licensure at the very least as well as the medical liability carriers.

Mahalo for the chance to share my concerns with you.

Hubert I. Caplan, M.D.

6 Wilson St.

Wellesley, Ma 02482

Sent from my iPhone

From: Dr Karen Frangos, PT, ND
President, Hawaii Society of Naturopathic Physicians
P.O. Box 941
Kihei, HI 96753

February 19, 2014

Position: Strong opposition to SB 2577 SD1 relating to Naturopathic Physician prescribing rights
Hearing: 10:30 am, Feb 20, 2014 in Conference room 229

To: The Honorable Senator Rosalyn Baker, Chair, the Honorable Senator Brian Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection

Dear Senators,

I am Karen Frangos, PT, ND, President of the Hawaii Society of Naturopathic Physicians (HSNP), writing on behalf of HSNP in opposition to SB 2577 SD1, asking that you consider opposition, as well.

There have been no reported cases of harm regarding prescription medication since HI Naturopathic Doctors (NDs) were granted prescriptive authority on January 1, 2010, so this bill is, frankly, unnecessary.

This bill is also unreasonable by proposing that NDs be required to have Medical Doctors (MDs) review all of their prescriptions. NDs in HI are already regulated by our governor-appointed Board of Naturopathic Medicine, which is responsible for the development and proper utilization of the Naturopathic Formulary.

This bill also calls for limitations in ND prescriptive capacity by removing items from our formulary. HSNP insists that the current formulary remain intact with continued authority and oversight by the Board of Naturopathic Medicine.

The Board in HI has adopted higher standards for competence and safety for NDs than any other state in the country, so the HSNP feels that additional regulations are unwarranted, including the need for continuing education (CE) requirements. If, however, legislators agree that CE is required to help fulfill the Board's mission to assure high standards, the HSNP has already voluntarily recommended a requirement of fifteen (15) hours biennially of pharmacy-related CE to coincide with the biennial renewal of ND licenses.

Thank you for this opportunity to provide testimony and for your careful consideration.

Dr Karen Frangos
President, HSNP

February 19 2014

To Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Taniguchi, Vice Chair, and other distinguished members of the senate committee on commerce and consumer protection:

I am a Naturopathic Physician and I am in strong opposition of SB2577 SD1, and I request that you do everything in your power to oppose this Bill. Licensed Naturopathic Doctors are highly trained as qualified primary care doctors and for the last 5 years of using this current formulary in Hawaii there have been no problems or complaints. This bill not only is unnecessary but would hinder patient care and would involve medical doctors who have not been trained in Naturopathic Medicine and do not have the expertise or time to oversee Naturopathic protocols. There would be privacy issues as well as burdening an already overburdened system. There would be endless implementation and legal problems if this bill is passed.

Sincerely ,

Donna Caplan, N.D.
Po box 1239
Kilauea , Hi. 96754
828-6153

Sent from my iPad

Daniel Cordell

87 E Waipullani Rd

Kihei, HI 96753

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a licensed physician and should be allotted the rights of delivering care according to the guidelines of licensure.

Thank you for hearing and honoring my testimony,

Sincerely,

Daniel Cordell

I oppose this bill to limit the prescriptions of naturopathic medicines. People have the right to get a second, third or fourth opinion before making a decision based on their health. What's the big deal on limiting people who get results? What's the harm in doing things natural? The long term side affects only pertain to western medicine. America has enough funds for them. I know they don't make as much money on returning customers but I feel like I'd rather give my referral to someone who finds answers & helps me fix myself before having to go under any knife for a test & not 100% sure if it's going to heal me.

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them and to manage the medications I am on, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

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SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by

placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Nicholas Edgerton
Fairfield, CT
ND, L.Ac Candidate 2016

Jan Gardner
216A Kulamanu Place, Honolulu, HI 96816

February 18, 2014

Position of Testimony: Strong Opposition to SB2577 SD1 Relating to
Naturopathic
Physicians

The hearing for this measure is at 10:30 am on February 20th, 2014 in
Conference
Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian
T.
Taniguchi, Vice Chair, and other Members of the Senate Committee on Commerce
and
Consumer Protection:

I hope that you will do everything you can to oppose SB2577 SD1. This bill
would
require naturopathic physicians to reduce or give up prescription rights
that
are necessary to their services. My naturopathic doctor's ability to write
certain prescriptions when I need them, without the inappropriate
restrictions
proposed by SB2577 SD1, is an important part of my health care.

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Thank you,
Jan Gardner
Wine

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

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Thank you,
Nathanael Williams, ND

Kelli-Rose Hooser

From: Celia.C.Suzuki@dcca.hawaii.gov
Sent: Wednesday, February 19, 2014 11:25 AM
To: Kelli-Rose Hooser
Subject: Composition of the Board of Dental Examiners as of 2/19/14

12 Members: 8 practicing dentists; 2 dental hygienists; 2 public members

Dentists:	Term to expire
Melanie Vallejos/Maui	6/30/14
Candace Wada	6/30/14
Mark Baird/Kauai	6/30/15
Paul Guevara	6/30/15
Mark Chun	6/30/16
Garrett Ota/Hawaii	6/30/16
Staphe Fujimoto	6/30/17
Dennis Nagata	6/30/17

Dental Hygienists:	Term to expire
Janet Primiano	6/30/17
Vacant	6/30/14
(Marilyn Nonaka resigned in January 2104)	

Public:	Term to expire
Rodney Ching	6/30/17
Vacant	6/30/14

February 18th, 2014 Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians
Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

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Thank you,
Jackie Gunther 13006 NE 41st Ct Vancouver, WA 98686 jgunther959@yahoo.com

To whom it may concern:

This comes down very simply to this:

There are no aspects of healing that are any better or worse than another. They all have their right to be heard and not undermined by another that someone has arbitrarily said is a 'better' way. This is what America was founded on - the freedom to choose what we feel is best for us. We (the patient) must be allowed the opportunity, the right, to take our responsibility in making our choice as to who is going to care for us and it is the government's responsibility to support that, not dictate that another is a better way.

SB2577 is just another way of saying to the voter, (the everyday guy/ girl that makes this country what it is) "You are not smart enough, to make a decision for yourself." Dear Mr. representative - how would that sound to you if someone said that to you ???

All paths to health have their strengths and their weaknesses - Don't let money talk. Allow your constituents to make their own decisions.

Regards

Dr. Sierra L. Levy

1993 South Kihei Rd.
Suite 216
Kihei, HI 96753

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. Me and my naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of health care and wellbeing for my clients.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The very last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect access to the high level of naturopathic care that benefits the greater communities health and wellbeing.

Thank you,

Dr. Sierra L. Levy

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection: I am writing to you today to protect the prescriptive and independent practice rights of Naturopathic physicians in the state of Hawaii. These doctors undergo training that is as thorough and complete as that of Medical Doctors and render excellent care to their patients using natural therapies. These doctors are skilled in relating to the total needs of their patients in a holistic manner. Patients pay out of their own pockets for this personalized and alternative service.

To put these competent physicians under the direction and scrutiny of MD's who are unfamiliar with natural therapies is a gross curtailment of the freedom to choose health care in this nation. It would also deeply restrict the ability of people traveling to Hawaii to seek healing and have a negative effect on this significant segment of our visitors industry.

Please oppose SB2577 SD1 and keep Hawaii a place where care from these competent physicians can benefit all, residents and visitors alike.

Thank you,

Joy Wall, RN, LMT, MPH
PO Box 391182
Keauhou, HI 96739

From: Jo Anne Lipinski/ P.O. Box 193, Kula, HI. 96790
February 19, 2014

Position: VERY Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, not when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Warm Regards,
Jo Anne

Jo Anne Lipinski
P.O. Box 193 Kula, Hi. 96790
Telephone: 808-875-7345
Cell: 264-9569

February 19th, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians
Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

There's no good reason for this bill, and every reason to oppose it. Since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority almost five years ago, there has been no evidence whatsoever of patient harm pertaining to these prescription rights brought to the naturopathic Board. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Instead, the public has benefitted greatly from this prescriptive authority. The training of naturopathic physicians sufficiently prepares them for their prescription privileges, and they are highly qualified to offer all the services they currently provide, to the full extent of their licensed scope of practice, which is well defined. Standards of care have recently been adopted by the Board that provides oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights.

Furthermore, the Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Hawaii's naturopathic physicians have even taken the unusual step of voluntarily recommending that they complete 15 hours of continuing education in pharmacology biennially.

One of the more misguided aspects of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal. A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care.

Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

SB2577 SD1 would also hinder naturopathic physicians and reduce their effectiveness by placing other unnecessary, inappropriate, and impractical burdens on their practices. These include the requirement that they submit detailed monthly reports of each item they prescribe to the board, the requirement that they receive authorization from the Department of Commerce and Consumer

Affairs in order to prescribe any item from their own formulary, and the requirement that certain important prescription items, such as vaccines, medical oxygen, and some injectable medicines, be excluded from the naturopathic formulary. In some cases, requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

If this bill is not stopped, it will undermine the high standards that the people of Hawaii have come to expect from naturopathic physicians. It will also reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers, at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,
Sharon Rickman
1165 Officers Row
Vancouver, WA 98661

Terry Cromwell
59-326 Pualele Place
Kamuela, HI 96743

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

To: Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. My naturopathic doctor's ability to write certain prescriptions when I need them, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

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sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

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Thank you,
Terry Cromwell

To the Honorable Senator Rosalyn H. Baker, Chair, the Honorable Senator Brian T. Taniguchi, Vice Chair, and other Distinguished Members of the Senate Committee on Commerce and Consumer Protection:

I'm asking you to OPPOSE SB2577 SD1.

Not only do I find such legislation unnecessary, it's flat out embarrassing... in my opinion a unilateral, unwarranted attack against the Naturopathic community. There is no precedent for such regressive legislation. I see this as a misguided approach to force NDs into a subordinate role and to limit their scope of practice, while burdening MDs and the Board.

With Naturopathic Physicians playing an increasingly important role in many of Hawaii's underserved communities, this bill will only lessen the ability of Primary Care Naturopathic Physician to practice within the scope of their training.

I propose that the legislature find the HSNP's recommendation to require 15 hours of continuing education, biennially, to be adequate.

Thank you for your time,

--

Dr. Travis Thurston
Naturopathic Physician
Island Natural Medicine, LLC

Honolulu & Kailua, Hawai'i
Direct: 808-343-5501
IslandNatural.org



February 16, 2014

TO: Senator Baker and all those who are tasked with considering regarding Senate Bill 2577SD1

While it can be assumed that this Bill was composed and presented with the best interest of the people of Hawai'i in mind, I would urge you to see how utterly absurd it is and get on with the important and challenging task of dealing with legislation that actually benefits the people of Hawai'i.

Naturopaths have been caring for their patients with great skill and success for many years, both here and elsewhere. Their patients are more than satisfied with their services and have brought far fewer issues before their professional board than has been the case with allopathic MD's.

Not long ago, naturopathic physicians were given the well deserved right to prescribe pharmaceuticals, the same right any physician with equivalent training and experience is given. Since that time, there has been no issue or complaint that I can locate, or any other reasonable cause to waste time considering such a Bill.

Until such time as there is real and justifiable cause to consider such legislation, I would submit that you all have much to do and many matters to deal with where the interests and people are concerned. As a tax paying citizen, I would very much appreciate it if this matter were dropped and you were free to move on to matters where there is true cause for concern.

That said, I write this because I have utilized the services of ND's for about 45 years now, as have my children and many friends and family. Naturopathic and preventative health care have served us well, and the practitioners who have cared for us have been well educated, caring, and very competent. When there has been need for a referral to another type of health care provider, that referral has been made in excellent time and order. ND's are highly educated,

responsible, and very competent health care providers and well deserving of the right to draft prescriptions, in my experience. Further, I have not known anyone here or elsewhere who has a complaint or issue of any kind regarding matters of prescriptions, or indeed any other matter. Bear in mind that anyone under the care of an ND who prefers to see an allopathic MD for prescriptions is free to do so. Anyone under the care of an MD to begin with has no issue here at all. In fact, I am forced to conclude there is no issue here, and to suggest that perhaps the motives of the writers of this Bill be investigated, if indeed it is worth spending any more time at all on this matter.

Keep up the good work, we do appreciate all of your efforts on our behalf, in attending to the consideration of Bills worthy of your time and attention.

Thoughtfully,

Cassandra Fraser-Breaux and family,

Maui, Hawai'i