

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

I am writing you as the Chair of the Naturopathic Medical Committee, under the Osteopathic Medical Board, California Department of Consumer Affairs (and a former Licensee of the Hawaii Acupuncture Board).

This letter is in opposition to SB2577 SD1.

In California, we are currently working to actually expand the prescriptive privilege and responsibility of licensed Naturopathic Doctors. Restriction or abolition of prescriptive rights and privileges, as proposed in SB 2577 SD1, would decrease the public's access to qualified medical care. In an era where medical care is more and more difficult to obtain, any such restriction decreases citizen access to qualified care. Harm ensues when the public then seeks unqualified care, as they are unable to obtain substantial qualified care such as provided by licensed Naturopathic Doctors.

It is our primary mission to protect the public safety. Since you granted Naturopathic Doctors the privilege and responsibility of providing legend prescriptions to their patients in 2009, there have been NO instances of patient harm. I fail to understand how revoking these privileges will protect the public safety. Naturopathic Doctors are highly trained and qualified to care for patients using prescription drugs when necessary. Perhaps, given the numerous instances of patient harm resulting from Medical Doctors' prescriptions (almost 200,000 deaths in the US last year), THEY should have THEIR prescriptive rights limited, rather than Naturopathic Doctors.

I urge you to vote no on SB2577 SD1.

If you have any further questions, please don't hesitate to contact me.

Sincerely,

David R Field, ND, LAc  
Chair, Naturopathic Medical Committee, Osteopathic Medical Board of  
California  
46 Doctors Park Dr  
Santa Rosa, CA 95405  
707 576 7388 phone  
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David Ostler  
2548 East Manoa Road

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!

Sincerely,

David Ostler

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,

Nick Indellicati

~~ College of Life sciences

~ UF Human Nutrition and Food Science

## TESTIMONY

### REGULAR SESSION OF 2014

Green, Vice Chair Baker and Committee Members,  
Hearing 2-19-14  
Please make copies. Mahalo

RE: SB 2577SD1 Relating to Naturopathic Doctors

My name is Jamaica Hancock. I am a mother of three, a pre-med student, and a proud employee of Hilo Naturopathic Clinic for 10 plus years. My interest in becoming an MD is largely to aid in the integration of allopathic and naturopathic medicine. Not only have my children and I received the effective and nurturing care of naturopathy for the past 15 years, but also my extended family and friends.

I respectfully ask that you oppose this bill in its current form for the following reasons.

In my place of work I have seen the lives of many patients be turned around with the help of naturopathic doctors and their extensive knowledge of nutrition, pharmacology, illness and wellness, when allopathic medicine could not. This has also been my personal experience. This is not to say that allopathic medicine does not have its needed place, it most certainly does, as does naturopathy. Doctors of all kinds should be united by their one main purpose, helping patients obtain health and wellbeing. Revoking and/or changing the naturopathic formulary would greatly challenge this purpose which unites all healthcare providers.

Naturopaths have the capability and knowledge base to provide safe and effective care to patients of varying conditions. There is plenty of evidence available which provides the extensive education and qualifications of licensed naturopathic doctors. Where is the justification in reducing their abilities whereby questioning their capability to make sound professional decisions when providing care to their patients?

The real problem at hand is the lack of recognition for naturopaths and their great contribution to wellness, healing, as well as preventative medicine. The gratitude I witness daily from the patients who come in and out of my work place for the care they receive there is astounding. From IV therapy to herbal remedies, from whole body system nutritional guidance and education, quality time spent with their patients in basic and complex care, naturopaths utilize resources and tools that otherwise would not be available to patients in need.

Again, I ask that you oppose this bill and allow naturopaths their earned right to give people the care they so greatly need and deserve.

I thank you sincerely for your consideration of this matter,

Jamaica A. Hancock

I

Diane Faustin  
92-6009 Kohi St.  
Kapolei, 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 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,  
Diane Faustin

Helen Y Lee  
400 Hobron Lane, #2007  
Honolulu, HI 96815

February 18, 2014

Position: Strong Opposition SB2577 SD1 Relating to Naturopathic  
Physicians

Hearing at 10:30 a.m. on February 20<sup>th</sup>, 2014 in Conference Room 229

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

I am writing to request that the Committee Members do everything within  
your power to stop the SB2577 from moving forward. SB2577 will  
essentially have naturopathic doctors be restricted or give up prescriptive  
rights that are important in their services to patients. My health and well-  
being would be affected if my naturopathic doctor while taking care of me is  
restricted from writing prescriptions to support me.

For almost 5 years that the Hawaii's naturopathic physicians have been  
granted the authority to write prescriptions there has been no evidence of  
any mishap so far.

Naturopathic physicians are formally trained in caring their patients, and  
thus are qualified to write prescriptions when necessary to help their patients  
to regain their optimal health.

Having the requirement of a MD to overview the prescriptions written by naturopathic doctors is undermining and demeaning. It creates a sense of “UNSAFE” and “UNTRUST” for the patients. As an intelligent person and a patient, I am fully aware of whom I chose to support my optimal health and I do not wish any MD to get in the way. If I want a MD to overview a prescription I would go directly to a MD for my health issue; since I choose a naturopathic doctor MDs have no right to muddle in the naturopathic services at all.

I therefore, sincerely request ALL Distinguished Senators to realize that since naturopathic physicians are adequately and formally trained, to OPPOSE and STOP SB2577.

Please do not take our health in your hand; we have the right to choose.

February 19, 2014

Position: Strong Opposition to SB257 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,

Virginia A. Oram ND

Blair Centre for Natural Medicine

358 Blair Boulevard

Eugene, Oregon 97402

541.343.2384 phone

541.505.8449 fax

[Virginia@DrOram.com](mailto:Virginia@DrOram.com)

[www.DrOram.com](http://www.DrOram.com)

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Jenny Dooling  
P.O. Box 151  
Honolulu, HI 96810

To Whom it May Concern:

I strongly oppose this bill relating to Naturopathic Physicians.

Many thanks,

Jenny

> Peter & Sara Tapio  
> 19100 NE 112th St.  
> Brush Prairie, WA 98606  
>  
> 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,

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> Peter A. Tapio

> Sara M. Tapio

> Psalm 139

Mary Ruth Fechtig  
PO Box 337  
Albany, Oregon 97321  
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,

Mary Ruth Fechtig

I have a daughter living in Hawaii who would be unable to receive, if this bill is implemented, the medications and treatment required to eliminate a very serious parasitic infection which was diagnosed and is currently being treated in Hawaii. To have that treatment interrupted periodically by rules requiring outside verification and additional medical validation would be particularly disruptive to the treatment process and her health. Please consider the implications of this bill to patients of naturopathic physicians in the state.

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Dr. Gina Nick Cushman  
PO Box 12131  
Newport Beach, CA 92658  
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,  
Dr. Gina Nick Cushman NMD, PhD

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,  
Vernon Asato

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:

Yes, there is prescriptive abuse, but Naturopathic physicians are not the problem. The research clearly demonstrates that MDs are far more likely to overstep their training and make fatal mistakes. Many states which permit ND prescriptive rights have NO reported adverse incidents. Ever. Hawaii has not had a single incident either. And several states which have had many years of ND prescriptive rights are planning to broaden them, because their health care results are so encouraging.

Requiring both MDs and NDs to complete obligatory training hours and maintain continuing education hours in pharma is, across the board, a more effective solution to formulary abuses. MD mistakes are killing hundreds of thousands of people across the United States. And as you can see in the chart in this article, the island of Hawaii, where I live, has one of the worst mortality rates in the country. These are MD prescription deaths, this is clearly a problem, and it cannot be addressed by limiting ND formulary rights.

<http://www.theatlanticcities.com/politics/2013/11/alarming-spread-prescription-pill-deaths-across-us/7610/>

Statewide, we have a major problem with prescription drugs. The rate of prescription drug abuse here is growing exponentially.

<http://www.kitv.com/news/hawaii/drug-abuse-deaths-outpace-vehicle-crash-deaths-in-hawaii/22319886>

Naturopaths most often provide lower cost, non-pharma based remedies which work well, and are materially benign. In Hawaii, the evidence is overwhelming that their prescriptive behaviors have not resulted in a single adverse event. It is absurd and irrational to "fix" something that is, not only not broken, but beneficial to our residents. Naturopaths are part of the solution. Protect their practices.

Jack Wallace  
73-4425 Ahiahi Street  
Kailua Kona, Hawaii  
96740

Paul Reynold /PO Box 510085 Kealia HI 96751

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.



**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
Marsha Lowery ND	Individual	Oppose	No

Comments: Dr. Marsha Lowery ND PO Box 1462 Makawao, HI 96768 February 17, 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: Please do everything in your power to oppose SB2577 SD1. This bill would limit my ability to properly treat and care for my patients. The amendment to limit our formulary to items 1-7, would make it impossible for me to treat patients with any of the following: respiratory agents, gastrointestinal agents, cardiovascular agents, renal agents, genitourinary agents, psychotherapeutic agents, endocrine agents, medical gas including oxygen and parental therapy. This bill would undermine the high standards that our community has come to expect from our well-educated, well-trained and well equipped naturopathic physicians. It will also reduce the quality and effectiveness of some of our most valued primary care providers, at a time when there is already a shortage of PCPs. There has been no evidence of patient harm pertaining to our prescription privileges brought to the naturopathic Board. There has also been no overuse of our prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice, and not one lawsuit filed in this regard. Standards of care recently adopted by the Board provide oversight and clear criteria for the practice of naturopathic medicine in Hawaii. The Hawaii naturopathic Board has set some of the highest standards in the US for the practice, safety, and competence of naturopathic physicians. Most Hawaii licensed naturopaths are completing continuing education on their own, but Hawaii Society of Naturopathic Medicine (HSNP) has voluntarily recommended that we complete 15 hours of continuing education in pharmacology biennially. This is more pharmacology CEs than any other state with licensing. Although the majority of my training overlaps that of an MD, differences in our areas of expertise would interfere with a medical doctor's ability to make sensible reviews of naturopathic prescriptions and modalities. The fact that this bill would require MD oversight of everything I prescribe is impractical. If this were to become law, it would create issues with insurance, patient privacy, HIPAA laws, and much more. SB2577 SD1 would place unnecessary, inappropriate, and impractical burdens on both NDs and MDs. This includes the requirement that we submit monthly reports of each item prescribed to the board, and that we must receive authorization from the Department of Commerce and Consumer Affairs in order to prescribe any item from our own formulary. Please do everything in your power to stop this bill. Thank you, Dr. Marsha Lowery ND

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](mailto: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 will likely hurt some of the medical and health retreat industry in Hawaii, and cause delayed medical treatment by adding unnecessary bureaucratic oversight. Preventive medicine requires a particular understanding of the individual patient. It is unlikely any overseeing MD would properly handle the relationship between the patient and the ND they have selected to work with. I would also be surprised if there was not a legal overlap with other health information laws recently enacted.

MDs are not properly equipped to make well informed reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities or preventive care. The education of my naturopathic physician have been directed toward improved understanding in 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. Requiring an ND, by law, to subordinate their expertise to individuals untrained in naturopathic medicine is in essence using a lawyer to administer medical advice. If you find this to be the proper use of law in modern society, I suspect you missed something in your ethics class. 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,

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James Early

Guy Bar

4224 Willamette Ave.

San Diego, CA, 92117

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:

Our family is relocating to Hawaii this summer so I have decided to write 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.

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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,

Guy Bar

**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
Soffia Wardy	Individual	Oppose	No

Comments: 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

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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](mailto:webmaster@capitol.hawaii.gov)



Dmitriy Hari

476 Ulumalu Rd

Haiku, HI, 96708

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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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,

Dmitriy Hari

Please email your messages to: [CPNtestimony@capitol.hawaii.gov](mailto:CPNtestimony@capitol.hawaii.gov)

Your Name /Address

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.

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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.

Mahalo nui loa,

Carole Brazil

Position: Serious opposition to SB1577 SD1

To whom this may concern,

I am a current student at the Southwestern College of Naturopathic Medicine (SCNM). I am extremely opposed to this bill being passed considering I have dedicated my time and life to understanding the ins and outs of the human body. As NDs we are trained to monitor everything being put into a body, including prescriptions of any kind, and to be told another doctor has to over see what you are doing is demeaning. This act will cause a huge rift between the fields and right now the world needs anything BUT that. People are craving natural medicine again like they once did before the early 1900s. Does congress really know the history of Naturopathic medicine and its rise and fall? Do they know the extend to which NDs are trained? I highly doubt it because this bill would not even be an option if that was so. ND and MD take considerably the same board exams, with the exception that the ND focus on pharmacology in the second board rather than the first. This by no means suggest that and MD is better trained than an ND, it just points out the different priorities of both groups.

Please take some time and looking into what an ND does and is trained in. If you don't know where to start feel free to check out SCNM.edu to get started. NDs are competent, intelligent people who are going or have gone through medical school just like an MD. Neither is better or needs to be supervised. Different focuses do not mean lack of knowledge.

Sincerely,

Cassie Weickert  
2236 S. Evergreen Rd  
Tempe, AZ 85282  
816.645.0344

Cassie Weickert  
ND Candidate 2017 | Southwest College of Naturopathic Medicine

"The doctor of the future will give no medicine, but will interest her or his patients in the care of the human frame, in a proper diet, and in the cause and prevention of disease."

-Thomas Edison

Courtney Hawes  
2045 E Broadway Rd. #71  
Tempe, AZ 85282

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:

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Thank you,  
Courtney Hawes

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Thank you,

Tara Pollock

Southwest College of Naturopathic Medicine

Doctor of Naturopathic Medicine Candidate, 2017

Rick Havil  
25602 Alicia Pkwy. # 316  
Laguna Hills, CA 92653

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

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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

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Thank you  
Rick Havil

From: Shelley Nalepa

1667 S. Kihei Rd. # I-9

Kihei, HI. 96753

February 18th , 2014

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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.

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Thank you,

Shelley Nalepa

Michael Rak  
712 E Olive St  
Seattle, WA 98122

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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Michael Rak

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Thank you,

Lindsey Harding

Southwest College of Naturopathic Medicine Doctor of Naturopathic Medicine Candidate, 2017 Applied Kinesiology Course Vice President N-ACT Merchandizing chair

"Everyone you will ever meet knows something you don't." ~ Bill Nye

Audrey Miller  
Battle Ground, WA 98604

February 18<sup>th</sup>, 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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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,

Audrey Miller



Aloha Honorable Senators,

I write to OPPOSE a bill to restrict the prescription rights of Hawaii's Naturopathic Physicians. SB2577SD1 is not a good bill, not a good direction, not good for Hawaii. Here are a few of the common sense reasons to REJECT this bill.

1. It is regressive, withdrawing existing health care rights from the residents of Hawaii. We should be moving forward, increasing health care access for everyone.(1)
2. In a state already suffering from a shortage of physicians, restricting alternative care services becomes downright draconian. Our island is already a federally designated physician shortage area.(1,2)
3. Adding another demand on overworked physicians (supervising NDs) limits patient time further and adds unnecessary costs. (3)
4. This bill is clearly unnecessary in terms of health care quality. There have been no adverse medical incidents, much less a spate of them, which would call into question the quality of NDs prescriptive authority. In every state which permits prescriptive authority, NDs have a significantly higher safety record than MDs. (4)
5. If your main concern is the competency of the prescriber, then a better alternative bill would not interfere with existing prescriptive authority, but instead impose pharmaceutical CE hours for both MDs and NDs. It bears repeating, that in every state which permits prescriptive authority, NDs have a significantly higher safety record than MDs. (4)
6. Is the point to drive patients away from complementary and alternative medicine (CAM)? Research has shown that as health care costs rise, more people seek out alternative medicine. Studies also show that CAM saves millions on health care costs. The proof in the pudding: the vast majority of health care workers choose CAM for their own care. (5,6,7,8,9)

I urge you to preserve our health care choices, and reject this bill for the good of Hawaii's state of health.

Thank you.

Katherine M. Bell, Ph.D.  
73-4423 Ahiahi Street  
Kailua Kona, Hawai'i 96740

(1) [www.aap.org/en-us/...and.../hawaii.pdf](http://www.aap.org/en-us/...and.../hawaii.pdf) - American Academy Of Pediatrics

(2) <http://the.honoluluadvertiser.com/article/2005/May/09/ln/ln03p.html>

(3) <http://www.camlawblog.com/articles/malpractice-and-risk-management/negligent-supervision-of-nurse-by-md-basis-for-successful-malpractice-lawsuit/>

(4) <http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=7&ved=0CEwQFjAG&url=http%3A%2F%2Fwww.vtprofessionals.org%2Fopr1%2Fnaturopaths%2Finfo%2FNaturopath%2Fprescribing%2F2013.pdf&ei=DT0EU9aiH4mDogTX04K4BA&usq=AFQjCNGtY2-S9d2C1WdLWiX-90siLoO92A&sig2=b69SMU0EcBBCNCYY9-Cyng&bvm=bv.61535280,d.cGU&cad=rja>

(5) [www.ahec.hawaii.edu/workforce/Final\\_report\\_January\\_2011.pdf](http://www.ahec.hawaii.edu/workforce/Final_report_January_2011.pdf)

(6) <http://www.livescience.com/35431-alternative-medicine-treatments-popular-in-america-110201.html>

(7) <http://www.ncbi.nlm.nih.gov/pubmed/16722902>

(8) <http://articles.mercola.com/sites/articles/archive/2011/09/09/why-do-doctors-nurses-often-use-holistic-medicine-for-themselves.aspx>

(9) <http://www.panp.org/Savings>

Deanna Parrott  
45-224 Iole Street  
Kaneohe, HI 96744

February 18, 2014

**To:**

Honorable Senator **Rosalyn H. Baker**, Chair,  
Honorable Senator **Brian T. Taniguchi**, Vice Chair,  
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.

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Thank you,

Deanna Parrott

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:

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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,

Calvin Richards

**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
Mae Fuimaono	Individual	Support	Yes

Comments: I am writing this in strong support of SB 2577, I support this bill because the formulary for the ND's is very large and includes medications with very serious side effects. If you look at the typical ND program like Bastyr (the largest ND program in the US). The ND's have about 3 credit hours of Pharmacology. That is not nearly enough, not to mention the clinical time is spent utilizing natural therapies not "Western medicine". I have a Masters degree in Nursing and will sit for my APRN RX boards later this month. In order to prescribe (as a non physician) Here in Hawaii I have taken over 10 credit hours in Pharmacology and have over 600 clinical hours of prescribing in a primary care setting. Once I sit for boards I have to have over 70 hours of continuing education to maintain my prescriptive authority. If ND's keep their prescriptive authority in the state of Hawaii, Please limit the formulary and require continuing education.  
Thank You, Me Fuimaono RN, MSN

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](mailto:webmaster@capitol.hawaii.gov)

Randy Parrott  
45-224 Iole Street  
Kaneohe, HI 96744

February 18, 2014

**To:**

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

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Thank you,

Randy Parrott



I am opposed to the recent Lisa Ann Azzopardi, ND  
3056 Hillegass, Berkeley, CA  
94705  
Casual Locum Tenens in Maui, HI

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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[naturalama@netidea.com](mailto:naturalama@netidea.com) Box 31 Silverton, BC V0G 2B0  
250-358-2562 landline  
510-316-1676 mobile

A change in the shape of the body affects a change in the state of the soul..... Socrates

Senators,

Please do not consider passing SB2577SD1 as I have had continued care from a Naturopathic Dr. on Maui (Dr. Bonnie Marsh) and have appreciated the best care for my gynecological health and ongoing hormonal regulation. It is care I could not have received from my Allopathic doctor and having a Medical dr. oversee a Naturopathic doctor's prescriptive abilities is redundant, unnecessary and, perhaps, frustrating, as I would not be able to use the homeopathic remedy that have helped me rid myself of a long-term uteran infection. The infection was actually caused by Premarin that had been prescribed by the medical dr.! My body is sensitive and I need the care and support that my Naturopathic Physician provides for me. Please strike down SB2577SD1.

Sincerely,

Patrice Goodermont

Sent from my iPad

Susan Ullis  
6037 Olohena Road  
Kapa'a, HI 96746

February 18, 2014

Re: 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:

Dear Senators:

I came under the care of my naturopath for a chronic condition after my MD's, including a specialist, came up with with no answers. The tools in their arsenal were not sufficient to treat it. I am now on a prescription medication written by my naturopath to treat this condition, based on a lab-confirmed diagnosis the MD's did not even pursue. Also, through the use of naturopathic medicines, my naturopath was able to get me off the antacid prescription I had been taking for 15-20 years.

My naturopathic doctor's ability to write certain prescriptions without restrictions is an important part of my health care. Therefore, I'm writing to request that you do everything in your power to oppose SB2577 SD1.

I do not think understand why it would be considered that MDs have the superior education to make sensible reviews of naturopathic prescriptions. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. As I understand it, naturopaths have all the training of an MD, and then go beyond.

SB2577 SD1 would hinder naturopathic physicians, reducing their effectiveness by placing burdens on their practices. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you.

Susan Ullis

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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.

I have been a naturopathic physician in practice for 33 years. I practice in Oregon in a state with one of the largest prescription and formulary privileges. I have also served as president on the Naturopathic

Board of Examiners. Naturopathic physicians are well trained in pharmacy. These prescriptions are necessary for general/family practice and in the practice of primary care, which is what we practice as in Oregon. If there have been little complaints in regards to errors in prescribing in the state of Hawaii, I am confused as to why a bill would be passed to eliminate rights that Hawaiian naturopathic physicians have used for years. At a time when available medical care is sparse, and time for physicians to see and care for patients is limited, why limit an entire group of physicians to provide optimal health care to patients? What is next, taking prescription rights away from nurse practitioners? This process sounds discriminatory to an entire group of health professionals. I am not sure of the conflict of interest that may be involved here. I hope reasonable behavior will prevail.

Thank you,

Laurie Marzell, N.D.

Stacey De Bisschop

73-4609 Old Mamalahoa Hwy

Kailua-Kona, HI 96740

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 owe my current robust health to my naturopathic physician and 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 and aloha,

Stacey De Bisschop

Jamie Varize  
PO BOX 711626  
Mountain View, HI 96771

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,  
Jamie Varize

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,*

Pepper Weinglass

Sent from my iPad

Lorna Larsen-Jeyte  
PO Box 116  
Volcano, HI 96785

February 18, 2014

Regarding SB2577 SD1

Dear Senators involved with this Bill.

I have been a patient of naturopathic doctors for 30 years. I also respect and highly regard my allopathic physician in Hilo. HOWEVER, each one covers different areas of study and expertise and my health depends on both. For example: My allopathic doctor did not pickup on my weak thyroid condition NOR on my gluten allergy. However she monitors my sensitive gall bladder issues and cholesterol numbers. I consider both doctors to be integral to my overall health. Leave the system as it was created in 2009. Don't change things back. We have a shortage of good diagnosticians as it is!!! I prefer to use BOTH and I would like the Senate to maintain that integrity! Please don't make changes that would create hardships for either kind of physician. Their work is onerous enough as it is! If you would like to see our medical model continue successfully, please don't pass this Bill!

SB2577 SD1 is a highly regressive proposal reflecting a failure to honor and understand an entire profession. If it ain't broke, why muddle around with it?

Mahalo for your consideration,

Lorna Larsen-Jeyte,  
owner Kilauea Lodge in Volcano, 73 years old and happily healthy with the assistance of my wonderful doctors, including naturopaths and allopaths

Cathryn Moe  
P.O. Box 223827  
Princeville, HI 96722

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:

My Naturopathic Doctor helped to upgrade, sustain and possibly save my life. My life is worth living because my Naturopathic Doctor had an understanding of health issues and resources not available in any other Doctor's office. I honestly do not know what I would have done had I not found my Naturopathic Doctor.

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 for your understanding, consideration and care to make sure the best medical assistance is available to each person and that choice continues to be a part of the Hawaiian medical community.

Sincerely yours,

Cathryn Moe

February 18, 2014

From: Dr. Judi Jones  
2821 N 24th Street, Phoenix, AZ 85008

To whom it may concern,  
I am a physician as well as a patient of a naturopathic doctor.

SB2577 SD1 would hinder naturopathic physicians and reduce their effectiveness by placing 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 Judi Jones

Susan Kelley

91-261V Hanapouli Circle

Ewa Beach, Hi 96701

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.

Please do not move our health care options backwards. Naturopathic physicians offer a valuable option for those of us who want to take a proactive approach to our health, making educated, healthy lifestyle decisions that help us become and remain healthy. Of course, no one can guarantee we'll remain healthy despite our best efforts and our naturopathic physicians must be able to prescribe medication for us when that option becomes necessary. It is an essential tool.

Naturopathic physicians are well trained for their prescription rights and removing this right would tie their hands in managing our care and so hurt us, their patients. The legislature made a good decision in granting these rights in 2009; it has enabled our naturopathic physicians to practice effectively and no problems have arisen from these rights being given. If I want an allopathic physician to oversee my care, I can and will go to one. And if I choose a naturopathic physician, I want that physician to see to my needs without having to add an unnecessary, intrusive and disrespectful requirement that my doctor consult a different kind of doctor, one I did not choose, one who is not familiar with me, before my doctor and I can proceed to make decisions on my health care. It will add time, cost, and most likely result in worse care and friction in our health community. This requirement will cripple the naturopathic physicians and perhaps lead to the demise of their profession in Hawaii. Please, please do not let this happen.

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

Sincerely,

Susan Kelley



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,  
Monika Catanzaro

--

Monika J. Catanzaro, Esq.

**SB2577**

Submitted on: 2/18/2014

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

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Mark Shaw	Individual	Oppose	No

Comments: I support Naturopathic Doctors in Hawaii to practice what they were taught. Also to maintain the right to give good quality of care without being overseen by a medical Doctor.

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](mailto:webmaster@capitol.hawaii.gov)

David Geller – Portland, OR

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.

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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,

David Geller – Naturopathic Medical Student

To: The Honorable Senator Rosalyn H. Baker, Chair  
The Honorable Senator Brian T. Taniguchi, Vice Chair  
and 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.

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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,

Lawrence E. Woodhouse, PharmD  
Hawaii Pharmacy License - PH3295  
California Pharmacy License - RPH33

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.

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Thank you,

Yoojin Lee-Sedera, ND/NMD

**Red Rock Natural Medicine**  
653 N. Town Center Dr. Suite 400  
Las Vegas, NV 89144

Ph. 702.708.2207  
Fx. 888.809.4639

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Dear Friends,

Aloha! I am writing a letter stating my right to choose to see naturopaths without any new restrictions laid on them. I believe I receive superior care from them. I have experience many benefits from working with Naturopathic Physicians throughout my life, and I am 66 years of age.

I would like to see that the Naturopathic Formulary remain as it is, with the Board should retain the authority to add or delete any items on the formulary as experience demands. I thank you for your consideration in this important issue.

Mahalo Nui Loa.,

*Patricia Gardner*

Patricia Gardner  
PO Box 624  
Haiku, Maui, HI 96708  
808.572.7950  
[love@lightweavingjoy.com](mailto:love@lightweavingjoy.com)

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
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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,  
Vera Marie Asato

Tanya Morin  
725 S Power Road, Unit #216  
Mesa, AZ  
85206

February 18th 2014

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.

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Thank you,

Tanya Morin

Southwest College of Naturopathic Medicine ND Candidate, Class of 2017 Applied Kinesiology Q1  
Representative Naturopaths Without Borders - Medicinary Coordinator

[t.morin@scnm.edu](mailto:t.morin@scnm.edu)<mailto:t.morin@scnm.edu>

480-599-9985

Kristen McCormack

3433 E Avalon Dr

Phoenix, AZ 85018

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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Thank you,

Kristen McCormack

[K.McCormack@scnm.edu](mailto:K.McCormack@scnm.edu)<mailto:K.McCormack@scnm.edu>

ND Candidate 2017

Cynthia Wilson  
77-263 Holomakani Street  
Kailua Kona, HI 96740-4088

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.

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

Thank you,  
Cynthia Wilson

**Error! Hyperlink reference not valid.**

February 18, 2014  
Julie Haviland  
P.O. Box 1042  
Koloa, HI 96756

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. I have regular health care but prefer my naturopathic physician.

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.

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Thank you.

Julie Haviland

Dear Senators:

Please offer your opposition to SB 2577 SD1 as it is an unnecessary and potentially costly proposition that undermines the high standards and excellence in health care that Naturopathic Physicians in Hawaii provide to their patients.

NDs in HI are already held under great scrutiny by a governor-appointed Board of Naturopathic Medicine that oversees the practice activity of all licensed NDs in the state. Further regulation is completely unwarranted, especially since there have been no claims against NDs regarding prescriptive activity since the expansion of the HI Naturopathic Formulary on January 1, 2010.

Thank you for the opportunity to provide testimony and for your support of Naturopathic Physicians.

Dr Karen Frangos, PT, ND  
Maui Natural Medicine & Physical Therapy, LLC  
1367 S. Kihei Rd., #3-111  
Kihei, HI 96753  
808-891-1111  
[drkmfrangos@aol.com](mailto:drkmfrangos@aol.com)

Eva D. Yacobi

4225 E. McDowell Rd. Apt 3090

Phoenix, AZ 85008

February 18, 2014

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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,

Eva D. Yacobi  
Southwest College of Naturopathic Medicine  
ND Candidate, Class of 2017  
Holistic Health Coach  
[e.yacobi@scnm.edu](mailto:e.yacobi@scnm.edu)  
917-582-7767

Aloha and thank you for this opportunity to testify. I am a Hawaii licensed naturopathic physician educated @ <http://www.ncnm.edu/>. I encourage you to OPPOSE SB2577 on the following grounds.

- 1) ND's have sufficient medical training to support their prescribing rights. We are trained in natural, pseudo natural as well as IV therapy.
- 2) MD's DO NOT have the time to delegate "over seeing" a ND.
- 3) Patient's QUALITY of care will be grossly lost in the sea of paper work.
  - a) Over loads of paperwork with a medical office is currently overwhelming. In order to offer this care for their clients they will need to hire another person JUST to keep track of monitoring NDs. This is going to COST financially the MD as well as the **patients**.
  - b) As you may have experienced with your health care that communication between medical personnel can experience great delays due to the excessive demands on providers. There simply is not enough time in a day to make another phone call, or read another file.
  - c) THE COST will affect everyone. More STRESS for MDs and office staff. Right now the physician rate of addiction, depression & suicide is already alarming in the USA. They cannot "afford" another needless stress. See the following articles:



(It has been reliably estimated that on average the United States loses as many as 400 physicians to suicide each year (the equivalent of at least 1 entire medical school class). <http://emedicine.medscape.com/article/806779-overview>

Physicians & Depression: <http://emedicine.medscape.com/article/806779-overview#aw2aab6b3>

4) NDs are respected & honored with the NIH. See article: <http://nccam.nih.gov/news/camstats>

5) Hawaii is noted as one of the healthiest states in the country. One of the major contributing factors is the access to QUALITY care by naturopathic physicians.

6) From my point of view this goes back to money. I was told by a cardiologist 25 years ago that NDs will put him out of business because of the support we can offer. Once thought of the medicine of the future is now today.

7) NDs will make money with their prescribing rights preserved. They have that right the same as any other doctor because they are trained this way.

8) I have intimately worked at local, state, national & international levels with health care. Integrative medicine is imperative to us all. Please support the potential that **ALL PEOPLE HAVE THE RIGHT TO QUALITY HEALTH CARE.**

I request you to **OPPOSE Bill SB2577.**

If you have any questions please contact me at 808-646-1951.

Mahalo & Malama Pono!

Dr Valerie Simonsen, ND

License #115

Dr. Valerie Lane Simonsen, ND  
Naturopathic Physician (License Hawaii)  
Shaman  
Author  
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[www.hoknowmore.com](http://www.hoknowmore.com)

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Your donations are appreciated:

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**SQUARE**

I am charged 2.75% for swiped transactions.

3.5% + 15cents for manually entered transactions.

**INTUIT**

Rates vary according to your card.

2.70% for debit cards that are swiped.

3.7% for credit cards and manually entered debit cards.



TO: Senator Rosalyn Baker, Chair

Senator Brian Taniguchi, Vice Chair

Committee on Commerce and Consumer Protection: Senators Clarence Nishihara,

Sam Slom, Glenn Wakai

As a 66-year-old, of sound mind and highly educated, I am in excellent health and am on no medications, pharmaceuticals, nor prescriptions of any kind.

I attribute the quality of my good health to maintaining a healthy life-style, avoiding chemicals and consuming organic (especially non-GMO) foods that are grown locally -- as much as possible.

Once my health care was my own personal responsibility as an adult, I have entrusted my health care to, primarily, naturopathic, chiropractic and acupuncture specialists when needed -- which is seldom.

This legislation, SB2577 SD1, is Draconian. This legislation eliminates the freedom of choice of a large and well-informed segment of the population. This legislation is NOT "protecting the consumer" but is, instead, eliminating our freedom to choose the care we deem best for our bodies and our own personal well-being.

It is clear to me that this is a push on the part of the American Medical establishment to effectively eliminate competition of 'alternative' health-care practitioners and to (falsely) presume their allopathic authority and training is more comprehensive and effective than the training or expertise of other practitioners. This effort to create controlled public policy also segues nicely with the push to eliminate the availability of vitamins and supplements, which the FDA has long been threatening to have placed under the purview of prescription-writing physicians. This is clearly lobbying on the part of special-interest groups -- the American Medical Association and the highly-profitable pharmaceutical industry, and likely others who will monetarily benefit.

I am urging you to NOT control or restrict this thriving and important segment of the healthcare industry. A growing segment of the population consciously chooses naturopathic over allopathic practitioners for the very reason you may choose to enforce this limitation. It is populated and growing!

Were you to look at the history of medical care beginning in the United States in the early 1900's, you would see how the monied, leveraging and lobbying interests of the Rockefeller family have effectively compromised our health as a nation -- not only in the fields of medicine, dentistry and public health, but in agriculture, energy, environment, finance and world politics (i.e. the United Nations). History, alone, should inform us to carefully avoid falling into the 'trap' set early in the century by the likes of the incorrigible marketing and public relations founder, Edward Bernays. If we learn nothing, we must study history so as not to repeat or further the errors made in our past.

I urge you to vote for freedom of choice in health care by stringently opposing SB2577 SD1. In doing so, you will be protecting our health and our health freedom.

Sincerely,

Charlie White

From Linda R. Jalving  
4431 Donald Ave.  
San Diego, CA 92037

I also have a residence in Hawaii:  
16-2101 Hilonani Dr.  
Keaau, HI. 96749

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  
th 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,

Linda R. Jalving

Aloha,  
Honorable Senator Brian Taniguchi, and other members of the Senate Committee on Commerce  
and Consumer Protection:

As a naturopathic physician, I ask you to please oppose SB2577.

We have the training to be fully practicing primary care physicians. Our patients have the right to  
choose NDs for their medical care.

Mahalo.

Blessings and be well, sincerely,

Rev. Nima Rosepiper, ND (HI license ND-119)

Amanda Gronau  
1779-D Malanai St  
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 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.

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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 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,

Amanda Gronau



Michelle Clark  
3114 NE 141ST STREET  
Vancouver, WA 98686

February 18<sup>th</sup>, 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,

Ms. Shannon K. Suter  
PO Box 894199  
Mililani, HI 96789

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.

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.)

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 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,  
Shannon Suter

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 me and 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.

On a personal note, I had the privilege of being treated by my Naturopathic doctor (ND) during the grieving time of losing my 5-week old son. During that time, my adrenal glands were fatigued and over worked. My ND had prescribed me natural supplements to help in supporting my body and health, which resulted in improving my wellness and quality of life. Later, when I found out we were pregnant again, my ND gave me lots of helpful and practical advice, along with prescribing natural treatments in supporting my body and baby during the new pregnancy. Through the help and vast knowledge of my ND with natural medicine, I felt at peace and gained confidence and healing during my pregnancy journey which have continued throughout my new motherhood journey.

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.

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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,  
Margaret Barajas

February 18, 2014

Joseph Hwang  
95-1025 Kelakela Street  
Mililani, Hawaii 96789

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,

Joseph Hwang  
University of Hawaii at Manoa  
Secondary Education in Social Studies  
Class of 2016



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

Elizabeth Churchill  
2211 Mohala Way  
Honolulu, HI 96822

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,

Elizabeth Churchill

Devin Park  
1750 Kalakaua Ave. #3101  
96826 Honolulu, HI

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,  
Devin Park  
University of Hawaii at Manoa, Class of 2014  
Prospective PharmD Candidate, Class of 2018

I want the right to choose naturopathic doctors without any new restrictions laid on them

I receive superior care from them I support naturopaths in Hawaii to practice what they were

taught and to maintain the right to give good quality of care without being overseen by medical doctors.

Thank you

Michael D;Addario

To whom this may concern,

I am a current student at the Southwestern College of Naturopathic Medicine (SCNM). I am extremely opposed to this bill being passed considering I have dedicated my time and life to understanding the ins and outs of the human body. As NDs we are trained to monitor everything being put into a body, including prescriptions of any kind, and to be told another doctor has to over see what you are doing is demeaning. This act will cause a huge rift between the fields and right now the world needs anything BUT that. People are craving natural medicine again like they once did before the early 1900s. Does congress really know the history of Naturopathic medicine and its rise and fall? Do they know the extend to which NDs are trained? I highly doubt it because this bill would not even be an option if that was so. ND and MD take considerably the same board exams, with the exception that the ND focus on pharmacology in the second board rather than the first. This by no means suggest that and MD is better trained than an ND, it just points out the different priorities of both groups.

Please take some time and looking into what an ND does and is trained in. If you don't know where to start feel free to check out [SCNM.edu](http://SCNM.edu) to get started. NDs are competent, intelligent people who are going or have gone through medical school just like an MD. Neither is better or needs to be supervised. Different focuses do not mean lack of knowledge.

Sincerely,

Valerie Minnich  
1502 E Osborn Rd  
Apt 505  
Phoenix, AZ 85014

February 18, 2014

Position: Serious opposition to SB1577 SD1

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,

Asia Leong  
Honolulu, Hawaii

February 18, 2014

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,  
Janal Kim  
University of Hawaii at Manoa  
Class of 2016  
Microbiology B.A. Major Candidate

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. I have earned the 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 practice, when needed. 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.

My training as a Naturopathic physician sufficiently prepared me for my prescription privileges, and am highly qualified to offer all the services I currently provide, to the full extent of my 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-like Oregon where my practice is located. 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 nor educated 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 far exceeds that of any MD in many areas-nutrition, supplemental nutrients, herbal medicine, homeopathy. 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 nations Naturopathic physicians.

Please oppose SB2577 SD1 and protect access to the high level of Naturopathic care that I and numerous Naturopathic physicians provide throughout the United States.

Thank you,

Shawna Hasel ND

Gorge Family Wellness Center  
818 West Sixth St. Suite #1  
The Dalles, Oregon 97058  
541-296-0006

Jacob Hwang, 95-1025 Kelakela St. Mililani, HI

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:

Hawaii was the second state in the nation to license naturopathic physicians. 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 currently a second year naturopathic medical student at Bastyr University in Washington and we are trained in the use of prescription drugs. I feel that my education is competent for the knowledge and use of prescription drugs. We see this evident in the legislature at the state of Washington, where naturopathic physicians are granted prescriptive authority. As a local boy from Mililani, I would like the legal landscape to be favorable for my profession because I would love to go back to the islands to practice and provide 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,  
Jacob Hwang  
Doctor of Naturopathic Medicine Candidate  
Bastyr University, Class of 2016

Please oppose SB2577 SD1, a bill to restrict and impose additional regulation on naturopathic physicians.

I agree that these provisions are unnecessary and ill-advised.

I have always considered my health my own responsibility, and when I have had issues that needed expert advice, it was a naturopathic doctor I went to see. These doctors work with the patient in a way MDs rarely if ever do, evaluating and treating the entire person, not a symptom or cluster of symptoms. I am quite alarmed that naturopathy is not covered by my health insurance plan, because people have differing expectations of medical providers, and for people like me, it is the naturopath who meets or exceeds my positive expectations.

Wendy Schaefer  
Dufur, OR  
Formerly of Kea'au, HI  
Sent from my iPad



To whom this may concern,

I am a current student at the Southwestern College of Naturopathic Medicine (SCNM). I am extremely opposed to this bill being passed considering I have dedicated my time and life to understanding the ins and outs of the human body. As NDs we are trained to monitor everything being put into a body, including prescriptions of any kind, and to be told another doctor has to over see what you are doing is demeaning. This act will cause a huge rift between the fields and right now the world needs anything but that. People are craving natural medicine again like they once did before the early 1900s. Does congress really know the history of Naturopathic medicine and its rise and fall? Do they know the extend to which NDs are trained? I highly doubt it because this bill would not even be an option if that was so. ND and MD take considerably the same board exams, with the exception that the ND focus on pharmacology in the second board rather than the first. This by no means suggest that and MD is better trained than an ND, it just points out the different priorities of both groups.

Please take some time and looking into what an ND does and is trained in. If you don't know where to start feel free to check out [SCNM.edu](http://SCNM.edu) to get started. SCNM is accredited by the CNME which is based on a standard set by John Hopkins. NDs are competent, intelligent people who are going or have gone through medical school just like an MD. Neither is better or needs to be supervised. Different focuses do not mean lack of knowledge.

Sincerely,

Sarah Bennett  
815 N. 52nd St.  
Phoenix AZ. 85008

February 18, 2014

Position: Serious opposition to SB1577 SD1

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,

Jennifer Reyna

Sent from my iPadEMAIL TO: [CPNtestimony@capitol.hawaii.gov](mailto:CPNtestimony@capitol.hawaii.gov) SUBJECT LINE: Oppose SB2577 SD1 in the subject line February 18, 2014 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,  
Marjorie C. Taylor  
427 Craftsman Dr. NW  
Olympia, WA 98502  
[Mctaylor00@yahoo.com](mailto:Mctaylor00@yahoo.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 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.

Our family uses naturopathic care along with care from MD's and a DO. We chose a naturopath because we know that they will seek to help us maintain optimal health in many areas of life. The way their practices are set up they are able to provide us with much more individualized attention than typical MD's. We seek to use supplements, vitamins, herbs, and homeopathy as the first treatment for many issues. However, there are times when we are in need of a pharmaceutical medication or a vitamin that can be obtained from a traditional pharmacy. Our ND needs the freedom to prescribe pharmaceutical medications when it is necessary. They have received training in such and seek to do no harm to us, but rather help us. Do not limit them in such a fashion as you seek to do. Oversight should be reasonable by providing a broad spectrum formulary from which they can prescribe medications. Only medications that are inappropriate outside of the hospital setting and other specialized meds should be excluded.



Our naturopath, Dr. Kathryn Taketa-Wong has helped us in caring for our special needs children – both with issues that affect their learning and behaviors and with their rare medical issues. We value the care that she gives to our family and many other families whose children are on the autism spectrum.

Please honor Dr. Taketa-Wong and other ND's for the degrees they have worked so hard to obtain and for their level of professionalism as they treat their patients. The above statistics speak to the fact that no issue exists regarding inappropriate prescriptions being written or care given.

Thank you for supporting the on-going quality care that we citizens of Hawaii seek from our Naturopathic Physicians.

Lisa A. Reeder, BSN

Thomas C. Blackburn, Ph.D.  
73-4423 Ahiahi St.  
Kailua Kona, HI 96740

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. I value immensely my naturopathic physician's training and orientation toward my overall health and well-being, and how to improve such with a combination of supplements, nutrition, and yes, even, prescription drugs. Moreover, on Hawaii Island, which like much of the rest of the state, has **an acute shortage of primary care physicians**, the ability of naturopathic physicians to write prescriptions provides an extraordinarily beneficial contribution to the health care of thousands of state residents. In addition, this particular well-earned privilege can also beneficially lighten the load on many MDs who are already stretched too thin (if, in fact, they are still even here).

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. This bit of perspective in itself suggests that SB2577 SD1 is intended to **address a problem that doesn't exist**. As such, it is uncomfortably reminiscent of the multitude of voter suppression laws that have sprung up to combat non-existent "voter fraud." Are the motivations really to serve the common good, here, or to serve some other purpose, unacknowledged?

The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic

physicians. Other states, like Washington, already grant naturopathic physicians **greater** prescriptive privileges than does Hawaii. At least one other state with a long history of naturopathic licensure, Vermont, has recently moved to **increase** prescriptive privileges. Please oppose SB2577 SD1 and protect my access to the high level of naturopathic care that I deserve.

Thank you,  
Thomas C. Blackburn, Ph.D.

To whom this may concern,

I am a current student at the Southwestern College of Naturopathic Medicine (SCNM). I am extremely opposed to this bill being passed considering I have dedicated my time and life to understanding the ins and outs of the human body. As NDs we are trained to monitor everything being put into a body, including prescriptions of any kind, and to be told another doctor has to over see what you are doing is demeaning. This act will cause a huge rift between the fields and right now the world needs anything BUT that. People are craving natural medicine again like they once did before the early 1900s. Does congress really know the history of Naturopathic medicine and its rise and fall? Do they know the extend to which NDs are trained? I highly doubt it because this bill would not even be an option if that was so. ND and MD take considerably the same board exams, with the exception that the ND focus on pharmacology in the second board rather than the first. This by no means suggest that and MD is better trained than an ND, it just points out the different priorities of both groups.

Please take some time and looking into what an ND does and is trained in. If you don't know where to start feel free to check out SCNM.edu<<http://SCNM.edu>> to get started. NDs are competent, intelligent people who are going or have gone through medical school just like an MD. Neither is better or needs to be supervised. Different focuses do not mean lack of knowledge.

Sincerely,

Will Alvarez

ND Candidate, Class of 2017

Southwest College of Naturopathic Medicine Certified Pharmacy Technician | PTCB Certified Cultural Relations Board Chair | Naturopaths Without Borders Vice President of Special Events | BOT Club Sales Representative | 1Hour Break

February 18, 2014

Position: Serious opposition to SB1577 SD1

Sabra Stahl  
3220 SE 23rd Ave  
Portland, OR 97202

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Thank you for your consideration on this issue. I have been going to a naturopathic doctor for the past 23 years and consider naturopathic medicine to be foundational to my family's primary care.

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!  
Sabra Stahl

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.

Sincerely,

Jasmine van den Heuvel

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. Brandi Solace

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Dr. Brandi Bean Solace  
Solace Natural Medicine, PLLC  
PO Box 129  
McCall, ID 83638-0129  
208.634.7289 (main)  
208.634.1082 (fax)  
[www.solacemedicine.com](http://www.solacemedicine.com)



Susan Wilson  
78-7110 Kaluna St. PH3  
Kailua Kona HI 96740

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 want to personalize this letter to hopefully give it more impact,  
but the letter below is so well written and accurate, it really  
doesn't need much more. However, I would like to add, I am  
greatly disappointed that this bill has even come about and other  
than another attempt of the "MD's" trying to push out or control  
competition of a well needed alternative profession, I can't think of  
another valid reason this bill should be allowed to pass. The  
people of Hawaii have already decided what they wanted in  
2009. Why are you wasting time and money on this bill? So.....

**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

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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 my access to the high level of naturo**

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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 and to manage the medications I am on, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my health care.

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Thank you,  
Anton Alder  
120 Rennell St. Bridgeport, CT 06604

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:

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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,

Kate Egan, ND

Professor, Biology

Golden West College

----- End of Forwarded Message

Robert T. Dudley, Esq.  
73-1228 Ahikawa Street  
Kailua-Kona, Hawaii 96740

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 a former Marine and Vietnam Combat Veteran who has had to deal with health issue related to combat-based PTSD and Agent Orange poisoning for the last 44 years. I began using my Naturopathic Physician in the 1990s for virtually all of my health issues and without this highly beneficial path to alternative medical practices, my health status would not be in the state that it is currently, which is basically holding the symptoms of Agent Orange poisoning at bay and helping to control the negative aspects of combat-based PTSD. Without this alternate medical path open to me, I would be forced to rely on the Veteran Administration based health paths, which are not a viable path for me based on my observations of the health status of my combat brothers who have relied on the Veteran Administration's medical path that creates more health issues than it helps by using a massive pharmaceutical drug protocol with a vast number of detrimental side effects. These detrimental side effects are clearly known by the Veteran Administration Medical Doctors and clearly stated in the written descriptions of these drugs, and yet, these drugs are still continuously and massively prescribed to combat veterans, to their health detriment.**

**My ability to seek alternate methods to deal with health issues that were created during my combat service for America should not be restricted to only one type of medical alternative and no roadblocks should be created that may restrict, in any manner whatsoever, my Naturopathic Doctor's ability to continue treating my health issues in a manner that not only helps my body fight the symptoms of combat-based PTSD and Agent Orange poisoning, but does not create new and unnecessary health issues in the process.**

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.

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Thank you,

Bobby Dudley

Attorney Bobby Dudley  
73-1228 Ahikawa Street  
Kailua-Kona, HI 96740  
(808) 989-5848  
(808) 325-5423 - Fax  
email: [btdnalu@hawaiiantel.net](mailto:btdnalu@hawaiiantel.net)

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Richard McDonald  
PO Box 173  
Captain Cook, Hawaii 96704

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

RE: 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. As a citizen of the State of Hawaii & the United States of America it is my right to select my source of health and welfare care. I have worked with naturopathic physicians in the State of Hawaii for the past 16 years and have found their care to be professional, thorough, effective and appropriate. I firmly believe this bill would impair the excellent care I currently receive, and potentially adversely impact my wellbeing.

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

Thank you,

Richard McDonald

John Crews, 1032 S. Kihei Rd A522, Kihei, HI., 97653

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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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,

*John Crews*

Richard McDonald  
PO Box 173  
Captain Cook, Hawaii 96704

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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**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,

Richard McDonald



Aloha,

For the last 30 years I have relied primarily upon my naturopaths to give me quality care from their vast experience and knowledge. I would not get the same care if you change their right to prescribe healthy healing formulas for my care. I would not get the same quality care if they had to be under the different and limited scope of an MD. I expect you to support my RIGHT to have my CHOICE and to go to a NATUROPATH and to continue to receive the same excellent care now as I have been getting.

I have compared the care I receive from allopathic physicians and naturopathic physicians. NATUROPATHIC CARE AS IT IS, IS SUPERIOR CARE FOR ME AND MY FAMILY.

Mahalo,  
Brenda Kennerly  
Makawao, HI 96768

February 18, 2014

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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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,  
Jawad Majeed  
305 Walnut Street  
Green Lane, Pennsylvania

February 18, 2014

Janet Elizabeth Johnson  
556 NE 20th Pl.  
Newport, OR 97365

I strongly oppose SB2577 SD1 Relating to Naturopathic Physicians (Hearing at 10:30 am on February 20th, 2014 in Conference Room 229). I totally support Naturopathy and have had beneficial results from appointments with my Naturopath in Oregon.

SB2577 SD1 would hinder the practice of naturopathic medicine by preventing or impeding a naturopathic doctor's ability to write many prescriptions, and depriving patients of other naturopathic care options. Naturopaths are trained doctors, not children who need oversight.

I urge Hawaii to stop this Naturopathic bill.

Jessica Schweig

HC1 Box 5297, Keaau HI 96749

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,

Jessica Schweig

>> Cheryl McConnaughey  
>> 4634 Rolling Meadows Dr.  
>> Washougal, Wa. 98671

>>

>> 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

>>

>> 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  
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>>

>> There's no good reason for this bill, and every reason to oppose it.  
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> ----- Message truncated -----

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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:

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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. I AM a medical doctor( allopath) and I have welcomed the work done by my Naturopathic colleagues. I do NOT want to review their work, they are very skilled AND they are in our communities, keeping people healthy. Allopathic medicine ( MD's and hospitals) is great for acute illness and trauma- it is the Naturopaths, acupuncturists, massage therapists, chiropractors etc, that live in the community who actually promote wellness.

We are completely underserved on Big Island for medical care: this bill would make it worse.

The people are thriving with these choices available to them- DONT PASS SB 2577.

Jade P McGaff, MD  
808-640-1558  
Waimea, Big Island



Eric Wong  
1212 Nuuanu Ave., Apt. 2612  
Honolulu, HI 96817

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,

A handwritten signature in black ink, appearing to be a stylized name, possibly "John" or "Jonathan", written in a cursive style.

Vanell K. Naum  
89-1152 Pikaioleona Street  
Waianae, HI 9692  
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 a 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,  
Vanell K Naum

ONE GOD, ONE MIND, ONE BODY, ONE CHURCH,  
Vanell K. Naum  
Office: (808) 671-0066  
Fax: (808) 671-5552  
Cell: (808) 216-3850

Phil Bohnert, MD  
1676 Ala Moana Blvd., #1309  
Honolulu, HI. 96815

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

I am a physician practicing for 48 years, including 25 years in Hawaii, and I strongly oppose SB 2577 SD1. My career includes teaching 14 years at the University of Hawaii Medical School, and I have collaborated with several naturopathic physicians during that time. I have also successfully received medical help myself from 2 different naturopaths.

If this bill passes, and goes into effect on July 1, 2014, I feel strongly that it would be a major setback for naturopathic medicine in Hawaii. Naturopathic physicians:

1. have comparable training in pharmacology to MD's and DO's;
2. must pass multiple sets of national board exams;
3. have training in using natural treatments more so than MD's.

This bill places unreasonable restrictions on naturopaths' prescribing rights, which are essential to their services. Since the state approved a specific and limited list of prescriptions for naturopaths in 2009, there has not been a single complaint about their prescribing practice. This bill also places impractical burdens and reporting requirements on their practice.

We now have high standards of practice with naturopathic physicians. This bill would seriously undermine that and should NOT be passed.

Thank you for your consideration.

Respectfully,  
Phil Bohnert, M.D. FAPA

**SB2577**

Submitted on: 2/18/2014

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

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Greg Allen	Individual	Oppose	No

Comments: Please do not pass measure SB2577. My homeopathic doctor is my primary care physician and he needs to have full prescriptive care privileges. Thank you. Greg Allen

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](mailto:webmaster@capitol.hawaii.gov)

Angela Agrios, ND  
984 Monument St, Suite 201  
Pacific Palisades CA 90272  
2/18/2014

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. Agrios

**Dr. Angela Agrios, ND**

California Licensed Naturopathic Doctor (ND)

*Natural Medicine Primary Care Provider*

**Palisades Natural Medicine**

984 Monument St., Suite 201

Pacific Palisades, CA 90272

310.459.2942 phone

310.459.3164 fax

[www.PalisadesNaturalMedicine.com](http://www.PalisadesNaturalMedicine.com)

**California Naturopathic Doctor's Association**

*President, Board of Directors*

[www.calnd.org](http://www.calnd.org)

**American Association of Naturopathic Physicians**

*Member, House of Delegates*

[www.naturopathic.org](http://www.naturopathic.org)

**Realize Health - Talk to a Naturopathic Doctor**

*What you don't know can heal you...*

Greta D'Amico, ND  
2215 Spanish Corral Lane  
Auburn, CA 95603

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:

Please oppose SB2577 SD1 which intends to place further restrictions to the scope of practice of Naturopathic Physicians in Hawaii. As you may be aware, Naturopathic Physicians receive comparable pre-med and medical school training to family medicine Medical Doctors, with the addition of 2 years extra training in natural therapeutics. As part of our training in conventional medicine, we are fully trained in the use and management of prescription medications. This allows us legally to both prescribe when necessary and to decrease or eliminate medications for our patients as their health conditions improve under treatment. This training is standardized for all Naturopathic Medical Doctors in North America and covered in our board exams, internships and residencies. For this reason, it makes no sense whatsoever that Naturopathic Physicians should be supervised or overseen by any other authority other than their own board, which is already in place in the State of Hawaii.

Since Hawaii first allowed Naturopathic Doctors prescriptive rights five years ago, there have been no complaints to the board, lawsuits or any other evidence of misuse or endangerment to the public. So, this bill cannot be out of concern for public safety. New graduates every year seriously consider practicing in Hawaii. A reduced scope of practice there will definitely be a deterrent to many.

Please keep the licensed primary care practice of Naturopathic Medicine accessible to the people of Hawaii and allow them to practice as they were trained to do safely.

Please feel free to contact me if I can be of any assistance in this matter.

Yours sincerely,

Greta Hauck D'Amico, ND  
Auburn, CA



Helen Rapoza  
4819 Kilauea Ave. #6  
Honolulu, HI. 96816

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,

--  
*Helen Rapoza*  
*Helen's Haven*  
*4819 Kilauea Ave. #6*  
*Honolulu, HI. 96816*

[www.helenshaven.com](http://www.helenshaven.com)

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:

Please 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 daughter's naturopathic doctor's ability to write certain prescriptions when she needs them—without the inappropriate restrictions proposed by SB2577 SD1—is crucial to her health care.

This bill is wrong for many reasons. First, it does not remedy any harm. 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 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.

Further, the restrictive requirements in SB2577 SD1 have no precedent in other states where naturopathic physicians have prescriptive rights. Indeed, 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 because 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 daughter's naturopathic physician far exceeded that of any MD in many areas essential to her 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. 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! Let's not turn back the clock on the prescriptive abilities of our naturopathic physicians. We count on you to oppose SB2577 SD1 and protect my daughter's access to the high level of naturopathic care that she has been receiving.

Thank you,

Roxanne J. Fand,  
Retired UHM Professor

I strongly oppose the legislature taking away our right of freedom to chose our own doctor and oppose SB2577SD1

Please scroll down below! Urgent!

- **Regarding SB2577SD1**

- **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



Mahalo!

Deborah Pozin  
Sent From My iPad

Strong Opposition to SB2577 SD1

Bruce A. Dickson, N.D., DHANP  
Naturopathic and Homeopathic Physician  
119 NE 3rd St.  
McMinnville, Oregon 97128  
Office: 503-434-6515  
Fax: 503-472-5723  
E-mail: [drbrucedickson@mac.com](mailto:drbrucedickson@mac.com)  
[www.keytohealthclinic.com](http://www.keytohealthclinic.com)

**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 oppose SB2577 SD1. 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 been no abuse of prescriptive authority, no cases of naturopathic physicians prescribing outside of their scope of practice, and not one lawsuit filed in this regard.

Naturopathic doctors are trained and educated equally with medical doctors in the areas of clinical and physical diagnosis, lab diagnosis and pharmacology, histology, microbiology, biochemistry, organic chemistry, and anatomy and physiology. We have equal standards in our education: prior to admittance to graduate medical school we must have undergone and shown high competencies in pre-medical undergraduate studies. During medical school, we must pass basic science boards (after year two), clinical science boards (after year four) and maintain requirements for our licenses (continuing education every year). **This is important information because it demonstrates our strong education and training as general practitioners and that we follow protocol and standards of care.** We are governed by a board of naturopathic physicians that monitors licensure, acts as a resource to the community, fields potential concerns and oversees our jurisprudence. 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.

A disturbing aspect of this bill is the proposal that naturopathic physicians would be required to have MDs review all of their prescriptions, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. A naturopathic physician follows standards of care and PARQ and is trained to be a general practitioners who consults with and makes referrals as part of his/her practice. We are not opposed to working with MDs, just not in the capacity proposed by this bill. Requiring one type of doctor to oversee another's practice would simply create endless logistic, time and legal problems when it comes to issues of insurance, patient privacy and HIPAA laws. This does not best serve the patient.

SB2577 SD1 would reduce the effectiveness of the naturopathic doctor by placing inappropriate and impractical burdens on his practice. These include the requirement that he submit detailed monthly reports of each item prescribed to the board, the requirement that he receive authorization from the Department of Commerce and Consumer Affairs to prescribe any item from his 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 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 advances that naturopathic medicine has made in working together within an integrative medicine scope that best serves the patients.

Thank you,

*Danielle Engles, ND, Oregon license number #1572*

Advancement Officer and 2005 NCNM graduate

National College of Natural Medicine

049 SW Porter St.

Portland, OR 97201

503-552-1527

[www.ncnm.edu](http://www.ncnm.edu)

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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 D1, 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.

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Thank you,  
Lauren Ward-Selinger

# Regarding SB2577SD1

## 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)
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  -

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.

Michael Rigdon

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.

Please oppose SB2577 SD1 and protect access to the high level of naturopathic care that patients deserve!

Sincerely,

Joshua Green

--

In Health and Happiness,

Dr. Joshua Green

Naturopathic Physician  
Classical Homeopath

13 Kilburn St. Burlington, VT 05401  
(802) 238-8603

Kathy Kamei  
45-714 Lanipola Place  
Kaneohe, HI 96744

February 18, 2014

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Thank you,  
Kathy Kamei

Aloha,

N.Ds have been practicing in this state for over 20 years and now this. We were one of the first states to even require licensing and now they are tightening the noose. This would certainly put an extra burden on these practitioners to operate. I have been a patient of multiple NDs over the past 20 years and have received the best care. These are highly trained individuals who invested much of their time and money into their training, and have established patients. Now the M.D.s want to siphon off their hard earnings from the NDs pool of private clientele in a ridiculous scheme to oversee them.

As an hypothetical example: In contrast I would be very upset as a massage therapist to have the extra paper work and financial burden and an invasion of my clients personal records by a chiropractor that they did not choose.

This is about the patients freedom as much as the NDs. Basically it is forcing patients to be indirectly under an M. D. s care when they do not wish it. We are already wary of the federal health care electronic system that is being forced upon us which these M.D.s will most likely join. Will these patient records probably be come a part of it? Stop the ridiculousness.

Mahalo,

Linda Manning L. M. T.

1302 Wawe place

Honolulu, Hawaii 96818

ditto to the following letter..

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

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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,

Linda Manning

**From:** Dr G  
**To:** CPN Testimony  
**Subject:** Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians  
**Date:** Tuesday, February 18, 2014 1:11:54 PM

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February ,2 014

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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Aloha Members of the Legislature,

I am writing to state my very strong opposition to SB2577SD1 limiting the rights and privileges of naturopathic physicians regarding prescriptive rights for their patients, for several reasons.

- 1) Hawaii needs all the competent, well trained and capable physicians possible, with full rights of prescribing appropriate treatment protocols
- 2) Naturopathic doctors have had absolutely no complaints against them for such a Bill to be proposed or moved forward, and have had equally thorough training in pharmacology, equivalent to others with prescriptive rights.
- 3) NDs are highly well-trained, well-educated and ethical physicians who serve their patients with the greatest of astuteness regarding their medical and pharmacological needs.
- 4) My personal experience with the diagnosis, treatment and follow-through of my personal naturopathic physician has been of the highest standard that I could wish. In fact, I have often needed to be treated with the prescriptive capacities of my ND due to a lack of appropriate treatment or diagnosis, or a mis-diagnosis, or a missed diagnosis by my MDs. Recovery and return to health has been the result of all such RX interventions by my ND. Additionally, and importantly, with no side-effects, that have often come from other prescriptive treatment approaches. I also completely trust, after all these years, that referral and/or cooperation will be appropriately made as needed.
- 5) Importantly, with physicians coming to Hawaii temporarily, then leaving after 6 months or a year, the sole continuity of care that I have had for the past several years is by my naturopathic physician and their deeper knowledge of my on-going issues as a whole person.
- 6). I do not understand what the premises are for submitting such a Bill, since there is no evidence of need for it, no standards of practice issues to consider, and no cost effectiveness factor. At this critical time in history it is already difficult enough for most people in Hawaii to obtain a physician's care, particularly if newly arrived here, or a family practitioner who will be with you over the years. In fact, such a Bill, if passed, would put further burden on all other branches of medicine, on ERs, on emergency clinics, on MDs, PAs, RNs, etc. who are already overworked and overstressed and thus prone to even greater error under such circumstances.
- 6) Additionally, as our Hawaii population ages, and we know that elders react more strongly to all medications, having the careful and well modulated prescriptive options that also provide titrated doses of natural and non-harming prescriptive natures, among their overall RXs, is of extreme importance.
- 7) Related to all of the above is the important issue of freedom of choice by the public, the availability of a multiplicity of options to make such choices, and a values based self-education by the patient and their doctors in determining appropriate treatment plans, pharmacologically and otherwise within the wider medical field..
- 8) I believe the public also needs to be informed and educated about what is the underlying criteria for considering or proposing this seemingly uncalled for legislation.

Therefore, I ask you and your committee members, with great respect, **NOT TO ALLOW THIS BILL** to go forward, for the over-all wellness of the patients who deeply trust their ND physicians, for the excellence of profession itself, and for the larger social good of providing more and continuing access to good health care for patients.

With aloha,

Gay Leah Barfield, Ph.D., Lic. MFT

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.

Julie Claire Green, ND

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

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.

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 naturopaths.

J. Claire Green, N.D.  
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Thank you,

All my best,

Dr. Larry Herdener, ND  
340 NE Evans St,  
McMinnville , Oregon 97128

Charlotte M. Arakaki  
94-1440 Lanikuhana Ave. #454  
Mililani, HI 96789

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:

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Thank you,

Karmen Scott

13467 SW Laurmont Ct

Tigard, OR 97223