

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.

Sincerely, Doug Orton, Pahoia, Hi 96778

Carol J. Pegg

17192 E 2450 North Rd

Hudson, IL 61748

February 18, 2013

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

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

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

proposal. A naturopathic physician is a licensed physician and should be allotted the rights of delivering care according to the guidelines of licensure.

Thank you for hearing and honoring my testimony,

Sincerely,

Carol J. Pegg

Sent from my iPad

Dr. Elizabeth Elliott  
6700 Kalanianaʻole Hwy Suite 207  
Honolulu, HI 96825

February 18, 2014

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Thank you,  
Dr. Elizabeth Elliott

--

**Dr. Elizabeth Elliott**  
**Naturopathic Physician**  
**Licensed Acupuncturist**  
**(808) 542.5567**  
**[www.drlizelliott.com](http://www.drlizelliott.com)**

February 18, 2014

To the Honorable Senator Rosalyn H. Baker

<<http://www.capitol.hawaii.gov/memberpage.aspx?member=baker>> , Chair, the Honorable Senator

Brian T. Taniguchi <<http://www.capitol.hawaii.gov/memberpage.aspx?member=taniguchi>> , Vice Chair, and other

Distinguished Members of the Senate Committee on Commerce and Consumer Protection

<<http://www.capitol.hawaii.gov/committeepage.aspx?comm=CPN&year=2014>> :

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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,

Dr. Robert B. Kellum, N.D., Ph.D., MSOM/L.Ac, LMT  
HealthBridge, Inc.  
3046 NE 33rd Avenue  
Portland, Oregon 97212  
503-331-7393  
[healthbridge@integra.net](mailto:healthbridge@integra.net)  
Family Practice; Primary Care; Chronic Disease; Cancer; Obesity

Board Licensed Naturopathic Physician  
Reichian/Jungian/Body-Based "Threefold Therapist"™  
IPMT Graduate of Anthroposophic Medicine  
M.S.O.M. Classical Chinese Medicine Practitioner  
Board Licensed Diplomat of Acupuncture  
Board Licensed Massage Therapist

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**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
Steven Clements	Individual	Comments Only	No

Comments: I would like to voice my opposition to SB2577SD1 which would limit the ability of my ND (naturopathic doctor) in prescribing medication. It has been extremely difficult to find a good doctor here in Hilo. Now that I have, I am afraid that this law will prevent me from getting the health care that I need from the doctor I have chosen. Please don't take away my access to good medical care with this bad law! Aloha, Steven Clements Hilo, HI

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

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

As a naturopathic physician, I'm vehemently opposed to SB2577, as it would completely undermine the ability of naturopathic doctors to function in the capacity for which we are trained, which is as independent primary care providers. We are highly trained to provide primary care services with special emphasis on the thing so conspicuously lacking in the American health care system - prevention and effective interventions for the nation's biggest killers, particularly obesity cardiovascular disease and diabetes. Requiring that someone else oversee aspects of our services, namely prescriptive rights, would violate the doctor/patient relationship and would create an unnecessary burden for everyone involved. This would be a labyrinthine nightmare.

In the 5 years since the Legislature rightfully granted Hawaii's naturopathic physicians prescriptive authority, there has been no evidence of patient harm pertaining to these prescription rights brought to the naturopathic Board, and not a single malpractice suit. There has also been no overuse of prescriptive authority, no cases of naturopathic physicians using it outside their training and scope of practice.

We receive comparable training in pharmacology in medical school to that received by Medical Doctors and Osteopathic Physicians. We are also highly trained in other aspects of complementary, integrative healthcare that many of your constituents are actively seeking. There is a looming shortage of qualified primary health care providers, especially with the large influx of people into the health care system as the Affordable Care Act goes into effect. Don't make it worse by taking away our ability to practice effectively, which includes prescribing when necessary.

This bill does nothing to protect the public. Please vote no on SB2477.

Sincerely,

Dr. Julie Barter

--

**Dr. Julie Barter ND, LLC**

*Vice-President, Colorado Association of Naturopathic Doctors*

4840 Riverbend Road, Suite 100

Boulder, CO 80301

303.652.0903 P

303.449.3775 F

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

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Karly Powell, ND  
2841 SE Tibbetts St  
Portland, OR 97202

February 18, 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 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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SB2577 SD1 would 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 reduce the quality of naturopathic care and the effectiveness of some of our most valued primary care providers at a time when primary care physicians are already in short supply. The last thing we need is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect access to the high level of naturopathic care for patients who rely upon it.

Thank you,

**Karly Powell, N.D.**  
**Resident Physician**  
**National College of Natural Medicine**  
**(503) 552-1612**

Amanda Frick

900 Wilshire Blvd #415

Santa Monica, CA 90401

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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**The law allows for a Naturopathic doctor to be considered primary care, but eliminating prescription rights eliminates the ability for my doctor to provide me with primary care as may be needed. This can delay, hinder or eliminate the proper treatment, unnecessarily.**

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Thank you,

Office of Amanda Frick, ND  
Licensed Naturopathic Doctor  
900 Wilshire Blvd, Suite 415  
Santa Monica, CA 90401  
Office: (424) 645-7456  
[info@dramandafrick.com](mailto:info@dramandafrick.com)  
[www.dramandafrick.com](http://www.dramandafrick.com)

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Hilary Back, ND, Lac  
20 N 4<sup>th</sup> Street  
Carbondale, CO 81623

February 18, 2014

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Thank you,

Hilary Back

Dr. Hilary Back  
Back to Balance  
Naturopathic Doctor, Licensed Acupuncturist and Chinese Herbalist  
(970) 963 - 6500  
[www.backtobalancedoc.com](http://www.backtobalancedoc.com)

Sana Eang

February 18, 2014

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Thank you,

Sana Eang



2/18/14

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,

Jill Zdan

500 N Metro Blvd  
Apt 2300  
Chandler, AZ 85226

Anja Lindblad  
1981 N. Broadway Ste 255  
Walnut Creek, CA 94596

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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is to turn back the clock on the prescriptive abilities of our naturopathic physicians. Please oppose SB2577 SD1 and protect access to the high level of naturopathic care that our human community deserves.

Thank you,

Allyson Kohlmann  
1621 NE Killingsworth St, #2  
Portland OR 97211

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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Thank you,



L. Susan Andersen; ND, LAc

644 SW Coast Hwy, Ste D

Newport, OR 97365

February 18, 1014

Sarah Cimperman  
116 West 116th St. #5B  
New York, NY 10026

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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Michaela Falkner  
Phoenix, Az

February 18, 2014

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Michaela Falkner

Michaela Falkner  
Third Year Medical Student  
Southwest College of Naturopathic Medicine Peer Mentor Co-Lead Designs for Health Student  
Representative [m.falkner@scnm.edu](mailto:m.falkner@scnm.edu)<mailto:m.falkner@scnm.edu>  
480-779-0572

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February 18, 2014

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480-779-0572

**From:** [Susan Andersen](#)  
**To:** [CPN Testimony](#)  
**Subject:** Strong opposition to SB2577 SD1 Relating to Naturopathic Physicians  
**Date:** Tuesday, February 18, 2014 12:49:24 PM

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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,

Isadora Guggenheim, ND, RN, MS, CNS LMT

Second Nature Naturopathic Care, LLC

For Naturopathic Medicine: 15 East Putnam Avenue Suite 271 Greenwich, CT. 06830

For Holistic Nursing and Massage therapy: 8 Rockland Place Nyack, NY 10960 and Piermont Gynecology  
105 Shad Row Suite 1B Piermont, NY 10968

For all appointments: Tel: 845 358-8385 Fax: 845 358-2963 Email: [isadoraguggenheim@msn.com](mailto:isadoraguggenheim@msn.com) or  
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Website: [www.secondnaturecare.com](http://www.secondnaturecare.com)

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We specialize in reversing chronic disease. Your health starts here.

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Thank you,

Darin Ingels ND

Ingels Family Health

2425 Post Road, Ste. 100

Southport, CT 06890

P: 203.254.9957

[dingels@gmail.com](mailto:dingels@gmail.com)

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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,

Lisa Matejka

National College of Natural Medicine Student, Class of 2016

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

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

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

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

I have personally benefitted from natural medicine on many occasions in my life and it has provided me relief when traditional western medicine could not.

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Regards,

Chenise Kanemoto Iwamasa, Esq.  
Law Offices of Wesley Y.S. Chang  
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Honolulu, Hawaii 96813  
Ph: 808-534-4803  
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I would like to add that I have been using prescriptive drugs in the state of Washington for 25 years without any problems. My patients consider me their primary care provider and having prescriptive rights ensures that they can receive the most appropriate care available.

Thank you,

V. Joseph Wessels Jr., N.D.



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Thank you,

Steven M. Moore, DC ND  
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206-382-9977

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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Thank you,

Dr. Nina Paroo

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

**Aloha and thank you for reading this**

**We have used Naturopathic doctors for 40 years and have found their advice has kept us in good health because they work with the 'whole person'. We want to see them be able to continue to practice as they have, and are submitting testimony in support of them.**

**Thank you, Tomas and Joan Heartfield, PhD**

Tomas and Joan Heartfield PhD  
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808 572-1250

## **Regarding SB2577SD1**

- **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. 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.

Dr. Robin Borsa  
7025 E 1st Ave Ste 7  
Scottsdale, AZ 85251

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:

Although I do not reside in Hawaii, I am a naturopathic physician requesting 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. Robin Borsa

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Thank you,

-Tamara D. Trebilcock (Ackerman)

Shanti Albani  
1060 SW 46th Ave, Apt 211  
Pompano Beach, FL 33069

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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Thank you,

Dr. Shanti Albani

I strongly oppose passage of SENATE BILL 2577 SDI I am a 72yr old retired federal employee who has received positive results from Naturopathic physicians in Honolulu. These medically trained physicians play an important role in maintaining the health and well being of our community. We as residents of this state should be able to utilize the medical skills of our resident MD's as well as ND's.

Thank you for your consideration.

Al Joaquin  
(retired special agent in Charge, U.S. Secret Service)

Douglas McCraw  
323 Kuukama Street  
Kailua HI 96734

Date: February 18, 2014

Position: Strong opposition to SB2577 SD1 relating to  
Naturopathic physicians.

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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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



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Thank you,

*Dr. Michael W. Gravett*  
*Board Certified in Integrative Medicine*  
*NPI: 1710120050*

Judy McCraw  
323 Kuukana Street  
Kailua HI 96734

Date: February 18, 2014

Position: Strong opposition to SB2577 SD1 relating to  
Naturopathic physicians.

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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thank you, Amara Karuna

--

Amara Wahaba Karuna  
PO Box 1430  
Pahoa, HI 96778  
808-982-6755 home  
[amara@mindspring.com](mailto:amara@mindspring.com)

Check out my web sites at:  
<http://amarakaruna.webs.com>  
for info on trainings and services  
Also <http://www.karunaarts.com>  
for prayer flags, art and Goddess clothing  
Also <http://www.karunapublishing.com>

for inspirational  
music, books, children's books

And <http://www.heartbeatnurturing.com>  
for info on Healing our Hearts together

"There are only two ways to live your life:  
as though nothing is a miracle, or as though everything is a miracle."  
--Albert Einstein

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Notice to Principal is Notice to Agent / Notice to Agent is Notice to Principal\*

Liberty Blank

Portland, Oregon

Kihei, 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

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Thank you,

Liberty Blank

**From:** [Gen](#)  
**To:** [CPN Testimony](#)  
**Date:** Tuesday, February 18, 2014 4:33:22 PM  
**Attachments:** [Wd0000001.wps](#)

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Opposition to SB2577 SD1

Gaile Burrichter

PO BOX 415

Otis OR 97368

**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)

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



**From:** [Dr. Bhatia](#)  
**To:** [CPN Testimony](#)  
**Subject:** Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians  
**Date:** Monday, February 17, 2014 10:02:07 PM

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Aloha Ke Akua  
Sujata Bhatia  
808-874-9229  
314-276-5590

**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>
Katarina Culina	Individual	Oppose	No

Comments:

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

Do not reply to this email. This inbox is not monitored. For assistance please email [webmaster@capitol.hawaii.gov](mailto:webmaster@capitol.hawaii.gov)

Naturopathic physicians have helped me without any side effects.

I have used them for 20 years.

Please do not change anything.

It works...

Mayla Makana

I am a resident of Kula Maui Hawaii for over 40 years and while I am on medicare and can go to Kaiser doctors at any time, I have found that the natural methods of acupuncture and herbs have been very helpful for my long term problems.

I appreciate the life saving qualities of antibiotics and use them myself or for my family as needed.

I have found that I have real long term help and real relief of my symptoms from naturopathic methods such as herbal formulas and acupuncture and I have been helped with chronic pain with body work. I have never heard of a case in my 40 years in Hawaii of a person I know being harmed by a natural cure and I know of several who were harmed by chemical pharmaceutical medicines. Please do not do anything to limit the loving skillful care offered by these good physicians.

Sincerely

Chris Baz

--

Chris Baz  
Eco Products Maui  
HC1 Box 906  
Kula Hi 96790  
808 878 6762

2/18/14

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Honorable Senator Brian T. Taniguchi, Vice Chair, and other

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Thank you, Priscilla Skerry, N.D.

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.

I am also a property owner in Lahaina, and I plan to open a medical practice on Maui after my graduation, in 2016, from Bastyr University: a federally accredited institution teaching medicine from which hundreds of wonderfully skilled physicians have graduated. I will not be able to open a practice on Maui if this bill is passed. I will not put my future career in jeopardy by investing in a state that does not license doctors of Naturopathic Medicine.

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. Preserve my ability to open a practice on Maui in 2016, as I currently plan.

Thank you,  
Mary Browning  
3741 Lower Honoapiilani Rd. #202  
Lahaina, HI 96761

Mainland address while at school:  
8705 SE 50th Street  
Mercer Island, WA 98040



From: Joseph Comstock  
1633 Earlmont Ave.  
La Canada, CA 91011

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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Thank you,  
Sincerely,  
Joseph Comstock

Michele Lehman  
13716 15TH AVE NE  
SEATTLE, WA 98125

February 18, 2014

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Thank you, Michele Lehman, ND candidate 2017

Loretta Nelson

1377 Haloa Dr.

Honolulu, HI 96818

[loretta.nelson@gmail.com](mailto:loretta.nelson@gmail.com)

February 15, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

I am writing to ask that you 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.

I do not understand the rationale behind this bill – where is it coming from? I read there were over 300 emails against the bill and only three, one of them, the AMA, in favor. It seems that passing this bill would result in the legislature elevating the allopathic physician to a superior position over the naturopathic physician, saying that the naturopathic way and the naturopathic physicians are inferior and they must be watched over. This is not true and should not become our state's policy. Please do not pass this bill, please give serious thought to the future of our health care community.

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

Sincerely,

Loretta Nelson

Kyall & Candace Barrows

February 18th, 2014

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

Thank you,

Kyall and Candace Barrows



David Nelson

1377 Haloa Dr.

Honolulu, HI 96818

[davewnelson@gmail.com](mailto:davewnelson@gmail.com)

February 15, 2014

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I do not understand the rationale behind this bill – where is it coming from? I read there were over 300 emails against the bill and only three, one of them, the AMA, in favor. It seems that passing this bill would result in the legislature elevating the allopathic physician to a superior position over the naturopathic physician, saying that the naturopathic way and the naturopathic physicians are inferior and they must be watched over. This is not true and should not become our state's policy. Please do not pass this bill, please give serious thought to the future of our health care community.

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

Sincerely,

David Nelson

--

Dave Nelson

Allison Ellner  
1045 Dewitt Ave  
Encinitas CA 92024

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:

**A bill has been passed by the Hawaii Senate Health Committee that could seriously undermine your access to quality naturopathic care.** The bill, SB2577 SD1, would take away many of the rights gained in 2009 when several hundred patients submitted emails to lawmakers in support of efforts to improve Hawaii's naturopathic law. This overwhelming response played a crucial role in changing the law, and now you can take action again to protect your rights to naturopathic care.

**How the proposed bill could affect you:** SB2577 SD1 would hinder the practice of naturopathic medicine in numerous ways, preventing or impeding your naturopathic doctor's ability to write many prescriptions, and depriving you of other naturopathic care options that you currently have. This bill would also drastically change your personal relationship with your naturopathic physician by removing your right to have your naturopathic care be a private matter between just you and your doctor. It would require your naturopathic doctor to have an MD "oversee" your naturopathic care, including even the specific doses of your personal naturopathic prescriptions. This bill could even destroy your relationship with your doctor altogether, because the requirements in SB2577 SD1 are so draconian that some naturopathic physicians could feel compelled to leave Hawaii if the bill passes.

**Your help is urgently needed to stop this bill** and preserve your rights to the kind of naturopathic health care you deserve. Here's how you can take action and make a huge difference: please email messages opposing this bill to legislators at the address below. You can copy and paste the sample message that follows into an email. Add your name and address (and your name at the bottom), enter **Oppose SB2577 SD1** in the subject line, and send. For maximum effect, please modify and personalize the message - for example, add a story that shows how naturopathic medicine has helped you and why we need to expand, not shrink, the prescription abilities of naturopathic doctors. The sooner you send your message, the better.

**The deadline for sending your messages is 10:30 am this Wednesday, February 19th** (24 hours prior to the bill's hearing). If you are receiving this email after the deadline, there's no urgent need to send a message, as decision-making on this bill will occur at the hearing. However, messages sent after the deadline but prior to the hearing are still included on the website as late testimony.

Please let all your relatives and friends know about the damage this bill could do to your health care options, and rally their support to help us fight it. Forward this message to everyone you know, and ask them to spread the word and submit messages too. You don't need to be a Hawaii resident to make a difference; if people in other states submit emails, it will definitely help. We can't overstate the importance of getting as many people as possible to join you in sending messages opposing this bill. The future of your access to quality naturopathic care is at stake.

Thank you for whatever you can do to help!

Sincerely,  
Elijah Silver  
220 N Humboldt St Apt 2, Portland, OR 97217

February 18, 2014

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I'm writing to request that you do everything in your power to oppose SB2577 SD1

The over-site of quality training of ALL health professionals assures the public that there are educated, ethical, informed, experienced professionals not only in allopathic styles of health services delivery, but in many professional avenues. ND's are one of the options and in my experience have not gone down some of the not so lovely paths their allopathic colleagues have travelled. We the People have the right in this country under our constitutional rights, to choose who we will hire to care for our health care needs and illness care as well. Why at this time of inadequate systems to meet people's needs, would there be an impulse to limit those capable of supporting health and well-being? I smell a rat, and wonder if this legislation comes from a competition or fear that ND's are too good to compete against?

Have the courage to put this drivel in proposed SB 2577 SD1 where it belongs - in the compost heap - and support the right of competent caring professionals to get on with doing what they've been educated to provide their clients. Get "Big Brother" out of the middle of that relationship where it is not needed or desired - you want a HIPPA violation??? and allow people to decide for themselves who they will see to support their wellness and healing.

I encourage legislators to turn their attention to the many issues of cleaning up what truly needs your attention.....ethics, economy, jobs, and turning around the corruption that has side-tracked government to serve interests besides that of We The People! Thank you. Debra Fant, RN  
BSN INtegrative Health Provider, Oregon, USA

Eric Trout

619 Kapahulu Ave. Suite 208  
Honolulu, HI 96816

February 18, 2014

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Thank you,

Eric Trout

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 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.

We need to expand, not shrink, the prescription abilities of naturopathic doctors. I would like to have access to Naturopathic Medicine without the intervention of other medical providers.

Thank you,

Wendy Laudette  
2935 Crestview Drive S  
Salem, OR 97302

Deneb Bates, ND & Irfan Qureshi, MD

113 W 85th St, apt 1b

NY, NY 10024

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:

We are 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.

We are a husband and wife team of medical and naturopathic physicians. We have a tremendous amount of respect and appreciation for the care that each of us is able to provide to patients in various states of health and illness. We also know that although we share a common knowledge base between our conventional and naturopathic training, the holistic approach of naturopathic medicine is its own specialty, and cannot be overseen by a medical doctor. While collaborative care may offer the most optimal approach for patients, unfortunately that is not what will be achieved with the proposed bill SB2577 SD1. This bill will instead undermine the profession of doctorate level trained naturopathic physicians and effectively cause further damage to Hawaii's health care system, which struggles with a shortage of primary care physicians.

With physician level prescriptive rights, congruent with their degrees, the training and skills of naturopathic physicians can be used not only to fill the shortage of primary care providers in the state, but also the specialized skills of naturopathic doctors put a focus on prevention, and help to create a healthier population as a whole. Removing prescriptive authority from NDs creates a barrier to providing responsible, best practice care to patients.

Both Naturopathic and Medical Doctors play an essential role in optimizing health care for patients throughout their lifetime. Patients want and deserve access to competent providers. Depending on the patient and/or the circumstance, the best care could come from an ND, an MD, or collaboration between the two. SB2577 SD1 would unnecessarily undermine the competent care that naturopathic physicians can and should provide to people in Hawaii. Please understand and honor the distinct specialty of naturopathic medicine, and realize that it cannot be overseen by a MD. If the goal of this discussion is collaboration between MDs and NDs, we are all for it, but SB2577 SD1 is not the way.

Thank you for your consideration and please do everything in your power to oppose SB2577 SD1.

Sincerely,

Deneb Bates, ND & Irfan Qureshi, MD

Sent from my iPhone

Sent from my iPhone

Dr. Thauna Abrin, Naturopathic Physician  
PO Box 22 Greensboro Bend, VT 05842  
619 Kapahulu Ave. Suite 208 Honolulu, HI 96816  
February 18, 2014

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

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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. Please oppose SB2577 SD1 and protect my ability to prescribe medicines that help my patients recover from chronic diseases.

Thank you,

Dr Thauna Abrin

Alexis Chesney MS, ND, LAc  
Sojourns Community Health Clinic  
4923 Route 5  
Westminster, VT 05158

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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I am a naturopathic physician in the state of Vermont where I prescribe medications. It has been essential to my medical practice.

I encourage you to engage with naturopathic physicians in Hawaii to learn how they find their prescriptive rights an essential part to their medical practice. Naturopathic medicine brings value to the health of patients. Do not change the access to healing that is currently available. Please oppose this bill for the sake of quality health care in Hawaii.

Sincerely,

--

Alexis Chesney MS, ND, LAc

Theresa Andreae

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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Thank you,

Theresa Andreae

Please do not pass these changes- I prefer naturopathic medicine and it has always greatly helped me!

Thank you,  
Bernard Fickert  
Haiku, HI

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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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.

Thank you,  
Gail Littell, ND, LMT

I strongly oppose this bill,I have been the beneficiary of naturapathic care for at least 20 yrs, I am in excellent health, because of her excellent care, im 58 and at my correct weight,very active and healthy,dont take any rx drugs, I attribut it to her excellent care and guidance, sincerely,Connie Waggoner,Siletz Oregon

Sent from Samsung tablet

**Allie Litterer**

**4252 Wailapa Road**

**Kilauea, HI 96722**

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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Allie Litterer

**John Litterer**

**4252 Wailapa Road**

**Kilauea, HI 96722**

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Thank you.

John Litterer

February 18<sup>th</sup>, 2014

Julie Jensen  
1200 NW 6<sup>th</sup> Ave.  
Battle Ground, WA. 98604

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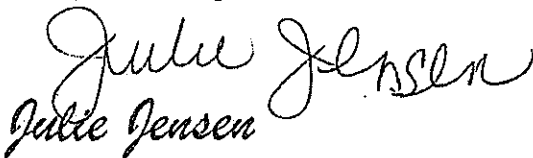
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Thank you,

  
Julie Jensen

Paulette Ogata  
1585 Kamohoalii St.  
Honolulu HI 96819

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,  
Paulette Ogata

Jodie Murdoch  
13523 92nd Pl NE  
Kirkland, WA 98034

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,  
Jodie Murdoch

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:

My primary health care doctor is a naturopath. I want him to be able to care for my health needs as he has studied as much as an MD and even impressed my MD friend from Germany who had a valuable treatment from him recently.

**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 for addressing my concerns and doing the RIGHT thing when it comes time to vote on this bill. Please OPPOSE SB2577 SD1

Kyle Meyer

4895 SE 30th Ave Apt 54

Portland, OR 97202

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

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

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

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

Thank you,

Kyle Meyer



--

Kyle J. Meyer

Priority One Nutritional Supplements NCNM Student Representative

NMSA Treasurer - NCNM Chapter

NCNM Naturopathic Medicine Program, Class of 2014

National Academy of Sports Medicine (NASM) Certified Personal Trainer (CPT)

(609) 558-4439

Penelope Sing  
23 Poipu Drive  
Honolulu, HI, 96825

Hello Senator Rosalyn H. Baker, Chair, Senator Brian Taniguchi, Vice Chair, and other members of the Senate Committee on Commerce and Consumer Protection:

Please vote AGAINST SB2577SD1, the bill relating to limiting prescription privileges of naturopathic physicians. My experience with a naturopathic physician was very professional and showed me how professional her decisions were. I saw such a breadth of knowledge and careful analysis on her part. Nothing was by rote or done without careful consideration and explanation. That included her prescription to me.

It seems to me that the real purpose of this bill is to limit prescription privileges of naturopathic physicians to protect "territory" of MDs. It is blatantly punitive against a whole group of physicians who have never been accused of inappropriate prescriptions. In fact, they have an extensive education and do a tremendous amount of good in our community. This bill is because of a "turf war" and you should vote against it because it is wrong to limit sincere health practitioners who are extremely well trained and do a good job for their patients.

Respectfully yours,

Penelope Sing

Nan Dudley  
73-1228 Ahikawa Street  
Kailua-Kona, HI 96740

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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Thank you,

Nan Dudley

Bernice Fielding

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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Thank you,  
Bernice Fielding

February 18, 2014

Laurie Kay Laibe  
163 Mehani Circle  
Kihei Hi 96753

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 feel I would not be alive today had it not been for my Naturopathic Doctor, I Had Uterine Cancer, had surgery to remove the tumor then under care of Naturopathic Doctor with the prescriptions he was able to give me besides other treatments my health has come back, if you take away the rights this bill wants to I will not have access to the quality care that keeps me healthy and able to live and work and have a wonderful life

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,  
Laurie Kay Laibe

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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,

*Joan*

Joan Haynes, ND

Boise Natural Health

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

208-338-0405

Your Name /Address: Laika Rodriguez 8010 Aumsville Hwy SE, Salem OR 97317

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.

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Thank you,

Laika Rodriguez

Jacqueline Davis

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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Thank you,

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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,

Jane Margulis



i would like to present strong opposition to SB 25777 SD1  
i have appreciated ND's care for the last 35 years in Hawaii  
i have never had any incident of poor care from these contacts  
i don't want my ND to be overseen by any MD as they are on different paths  
please reject this bill

ray dittman  
po box 1071  
pahoa, HI 96778

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. Naturopaths have been providing low-cost, safe, effective care for many years.

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 us for their prescription privileges, and we are entirely qualified to offer all the services we currently provide, to the full extent of our 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,

Karen Ball, ND  
Naturally Well  
2223 112<sup>th</sup> Ave NE Suite 201  
Bellevue, WA 98004  
Phone: 425-283-4928  
Fax: 425-283-4325  
[www.DrKarenBall.com](http://www.DrKarenBall.com)  
[drball@drkarenball.com](mailto:drball@drkarenball.com)

Aloha

**My name is Leslie Wingate and I live in Kapoho**

**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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**Thank you,**

**Leslie**

Jessyca Franco-Chavez

1478 N. 85th Street

Scottsdale, Arizona 85257

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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It's a Wonderful Life,

Jessyca Franco-Chavez

"Philosophy: how you climb up the mountain is just as important as how you get down the mountain. and so it is with life, which for many of us becomes one big gigantic test followed by one big gigantic lesson. in the end, it all comes down to one word, grace. It's how you accept winning and losing, good luck and bad luck, the darkness and the light."



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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.

Furthermore, on an incredibly personal note, this bill will limit my ability as a future naturopathic physician to gain experience and knowledge in this area if I were to pursue a residency in your state. As of now, it is top on my list; it would make me incredibly disappointed to have to change my future plans because of this.

Thank you,  
Blaire C Jarvie

--

Blaire Jarvie, MPH, RD  
University of Michigan School of Public Health

Dr. Jodi Vingelen  
Vital Life Medicine  
1603 116th Ave NE Suite 111  
Bellevue, WA 98004

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 ability to write certain prescriptions when I need to, without the unreasonable restrictions proposed by SB2577 SD1, is an important part of my service to my patients.

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. Vingelen

**Kill this Bill! SB2577SD1**

**Love, Light, & Laughter  
Donna & Prasad**

Aloha! Please vote against this bill . . . we need all the “health” practitioners we can get. The AMA is not the only medical authority—and it certainly doesn’t even endorse health, only symptoms and registered diseases. Please consider the following”

- **At issue:**
  - What is the motivation for such onerous legislation?
  - There have been no cases of harm, mismanagement, or prescribing impropriety against an ND's care brought to the Board since we gained prescriptive authority on January 10, 2010. (In fact, no Board action has been brought against a practicing ND in the last 30 years, since our longest practicing NDs have been in Hawaii)
  - There is no precedent for such regressive legislation in any other state where NDs have prescriptive authority.
  - Misguided approach to force NDs into a subordinate role and to limit their scope of practice, while burdening MDs and the Board, and with NDs playing an increasingly important role (dating back to 1927), with the increasing need for more well-educated, well-trained, well-equipped primary care docs in Hawaii to fill the void.
  - Even with comprehensive and comparable educational standards as independent primary care providers, NDs throughout the Islands, cooperate, consult and maintain positive relationships with other health professionals and MDs when it is in the best interest of the patient.
- **Pharmacology Knowledge**
  - NDs have comparable hours of pharmacology courses to other medical prescribing professionals. (# ?)
  - 1994 Legislative audit resulted in discontinuing CE. Most NDs attend continuing ed courses on their own, that include pharmacology.
  - HSNP proposes, 15 CE biennially. (Adequate and sufficient! Under the organization of the local HSNP, approval by national AANP and reviewed by ND Board)
- **Pharmacology Application**
  - 2010 Board members, Drs. Traub and Kern, met with pharmacy board in a cooperative effort to answer questions regarding ND prescribing patterns and to present a unified paper that would be distributed to all pharmacists.
  - Prescribing patterns, specifically as it related to **medical specialty medication**, was used in our formulary primarily in supporting and transitioning patients eventually wanting to be weaned from medication to other effective forms of health care. We also informed members that there are specialty practices within naturopathic medicine but that the former rationale was primarily true.
- **Naturopathic Formulary** should remain as it is, with the Board retaining the authority to add or delete any items on the formulary as experience demands.
  - Board has adopted **Standards of Practice and Care** that set higher standards for NDs, for competence and safety, than any other state in the country.
  - **Section 16-88-80(a)(6)(A), Hawaii Administrative Rules**, requires that a naturopathic physician shall maintain proficiency and competence, and be diligent in the provision and administration of patient care.

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

WE DON'T NEED THIS BILL. Mahalo for listening,

Mahalo,

Cat

Catherine Lampton

**Mediation&More**

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

PO Box 1828, Keaau HI 96749

808-640-1080, 968-7168 fax/ph

Byron and Jodi Vance

February 18 , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

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Thank you.

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

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

I am writing to register my opposition to this bill to restrict the flexibility of naturopathic physicians in their practice. I live part-time on the Big Island and use services there. My physical health has been GREATLY enhanced by the talented work of Naturopathic doctors. I fear restrictions would jeopardize my care.

Please do not tamper with what works for many.

sincerely,

Lalla Brutoco

**Lalla Brutoco**

[lalla@shangrilagroup.net](mailto:lalla@shangrilagroup.net)

cell 805.207.6086

I would like to voice my opposition to SB2577SD1 which would limit the ability of my ND (naturopathic physician) in prescribing medication.

It has been extremely difficult to find a good doctor here in Hilo. Now that I have, this law will prevent me from getting the health care that I need.

Please don't take away my access to good medical care with this bad law!

Aloha,  
Steven Clements  
Hilo, HI



Aloha

Please kill bill SB2577501.

In the 14 years I have lived on the Big Island I have brought my family exclusively to our Naturopath. I am relieved to have her dispense any medicines we may require while knowing she is trained and knowledgeable ....what's more Naturopaths are looking to prescribe the minimal acceptable dose of allopathic medicines where allopathic physicians are more likely to receive "bonuses" from large pharmaceutical companies for endorsing their products to patients as well as in scientific journals ...naturopaths are excluded from this corrupt behind the curtain "business deal endorsements "....they simply want to administer whatever it is that will help their patient with no financial motives...please continue their accessibility to prescribe medicine ...there is no precedent ,complaint , or reason to move forward with this bill ... Feel free to contact me 807-937-7749. Thank you very much for your time ,  
Nyree Parisi

Morgen Johansen, PhD  
45-641 C Apapane St.  
Kaneohe, HI 96744

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 oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up essential prescription rights. 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 patient of naturopathic care, I find my naturopathic doctor to be more knowledgeable, more effective, and more caring than my medical physician. My naturopathic doctor's plan of care for me has been instrumental in increasing my health and well-being, so much so that I continue to pay out of pocket for my naturopathic care.

I have found that the education of my naturopathic physician has far exceeded that of my medical doctor in many areas essential to my health care. For example, my medical doctor prescribed a pill to address my symptoms and then told me to come back in a few months to see how it worked. When one medication didn't work, my medical doctor prescribed a different pill, and so on for over a year, with little knowledge about what was causing my symptoms. My naturopathic doctor was able to address the cause of my symptoms, and was knowledgeable enough about my current prescriptions from medical doctors to create a treatment plan that was safe for me.

Requiring that a medical doctor oversees my naturopathic doctor and my treatment plan does not make sense considering that medical doctors have very little knowledge of naturopathic medicine. Such a requirement, of one type of doctor overseeing and reviewing 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, and would likely make my naturopathic care, which I pay for out of my own pocket, even more expensive. The requirements that SB2577 SD1 would impose seem blatantly unfair, and may even be discriminatory, because no comparable requirements are placed on other types of physicians.

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

Thank you,

Morgen Johansen, PhD

April Voves

1729 SE Marion St.

Portland, OR 97202

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

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

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

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

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

Thank you,

April Voves

From Barbara Brundage

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

I'm writing to request that you strongly 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.

Aloha,

*Barbara*

Barbara Brundage,  
President, Pacific Stock, Inc.  
Email: [barbara@pacificstock.com](mailto:barbara@pacificstock.com)  
[barbara@printscares.com](mailto:barbara@printscares.com)  
[barbarab@designpics.com](mailto:barbarab@designpics.com)

February 18, 2014

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Thank you,

Keri Brown

**Dr. Keri Brown, ND**  
**Wellness Programs & Consults**  
[www.drkeribrown.com](http://www.drkeribrown.com)  
[www.naturalhealingkits.com](http://www.naturalhealingkits.com)  
P.O. Box 796  
Salida, CO 81201  
719-539-7065 office  
[keri@drkeribrown.com](mailto:keri@drkeribrown.com)



Amy Day  
1220 Blake Street  
Berkeley, CA 94702

February 17, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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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.

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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,  
Amy Day

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.

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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,  
Donna Melead  
PO Box 1363  
Kapaa, HI 96746

February 18, 2014

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 & Consumer Protection:

*I am writing to you with one request: That you will do everything in your power to Oppose SB2577 SD1.*

My mother is a 15 year survivor of Stage 4 Breast Cancer.

*Chemotherapy just about killed her, so she sought alternative therapy with a Naturopathic Doctor. Thank GOD, we had a Naturopathic Doctor!!!*

*The knowledge and practices of the ND are the reason my Mother is still alive today.*

*The training of her naturopathic doctor's ability to write certain prescriptions when my mother needs them, without the inappropriate restrictions proposed by SB2577 SD1, is an important part of her health care.*

*I have been living with HIV for 25+ years, and it is because of my Naturopath Doctor, and her trained ability to write prescriptions, that I am still alive to write this letter to you.*

There is every reason to oppose this bill.

"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. Naturopathic doctors are trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient!"

The Hawaii Naturopathic Board has set some of the highest standards in the US for the practice, safety, and competency 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.

Why would you prevent these DOCTORS from doing their job?

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."

The education of, care of, and treatment from my, and my mother's naturopathic physician exceeded that of any MD in many areas essential to our health care.

If this bill is not stopped, it will undermine the high standards that the patients of Naturopathic Doctors, and 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 myself, my mother, and all patients. Allow us access to Naturopathic care that we deserve!!!!

Respectively,  
Carl Grimm  
20438 Silver Lake Drive  
Rehoboth Beach, DE 19971

Janine Aranyos February 18, 2014  
4308C Catalina St.  
Kapolei, HI 96707

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 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.

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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 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,

Janine Aranyos

Maria Lirio Palompo/95-957 Ukuwai Street, #1807, Mililani, HI 96789  
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.

And I need to mention that I am a recipient of a POSITIVE care I've received from Naturopathic Doctors like Dr. Steelsmith, Dr. Hardy and Dr. Coles. I was under their care and I am doing SO MUCH BETTER!!!

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

Sincerely,

Maria Lirio Palompo

Sarah Hourston  
2220 SW 1st Ave  
Portland OR 97201

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.

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Thank you,

Sarah Hourston, ND, MS  
Post-Doctoral Fellow  
Helfgott Research Institute  
National College of Natural Medicine  
503-552-1746

Robin Warren  
4435 L. Honoapiilani Rd. #230  
Lahaina, HI 96761

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 **Error! Hyperlink reference not valid.**, Chair, the Honorable Senator **Error! Hyperlink reference not valid.**, Vice Chair, and other-Distinguished Members of the Senate Committee on **Error! Hyperlink reference not valid.**:

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.

In the town of Lahaina, there are only two MD's that I can see through my insurance. Everyone else is trying to make appointments with these doctors also, so typically it takes a week or more to see one's PCP...If SB2577 SD1 passes, the process of getting well will be slowed down even more than it is now. Never was the adage, "Too many cooks.." more apt.

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,

Robin Warren

Post-Doctoral Fellow  
Helfgott Research Institute  
National College of Natural Medicine  
503-552-1746

This is a terrible bill written that would severely limit the capability of highly trained physicians.

I wonder what is behind this bill. There has been no issues filed against NDs for malpractice.

It would cripple their ability to help their patients while burdening MDs with unnecessary supervisory work.

NDs have comparable hours of pharmacology courses as MDs. Their continuing education courses include study of changes in the field.

I have personally had enormous benefit from working with naturopathic doctors who have employed a range of modalities unavailable elsewhere.

Please kill this bill.

Mark Sheehan, Ph.D.

Thambynathan Kathir  
107 Kaholalele RD  
Kapaa, HI 96746

February 18 , 2014

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: oppose SB2577 SD1 !

The following is a letter (below) being circulated, the substance of which I fully endorse. But I would like to prepend my personal comments. First let me say that this government intrusion into our personal freedom to choose who and how our health care is managed is both appalling and a slap in the face of our human rights. Second, as one who would be a dead man were it not for the guidance of "alternative" medical care practitioners, including one very competent naturopath, and as one who has survived cancer and other serious life-threatening illnesses and studied extensively various healing modalities: some things should be patently obvious to anyone who uses an unbiased lens to look at our medical system.

1) allopathic MD's and the system that they work through are failing miserably. I would dead if an MD had been in charge of my case.

Just look at the pandemic of disease and soaring health care costs. The system is failing in the core mandate for health practitioners: to heal people and preventive medicine. All that a regular MD knows is to a) prescribe drugs b) prescribe surgery as their main modalities. Most have very little training in the key variables affecting our health e.g. most doctors receive no education in nutrition, hormone systems, metabolic pathways etc). And while I have great respect for the diagnostic power of modern medicine it's advancements in bio-mechanical engineering (fixing your knee, hernia, etc) They fail miserably when it comes to metabolic issues. Just take for one example the number of hysterectomies done each year and the number of subsequent deaths among women due to post operative complications. If these women were to go to a naturopath and get away from the MD's perhaps they would have a better chance! It is one of the most sad and untalked about disasters of modern medicine.

So while I respect the committee's mandate to protect the consumer: you are focusing on the wrong "product" My God! We have an epidemic of diabetes and obesity in this country and these MD's \*still\* allow sugar and refined flour products to be part of the diet served to their patients in hospitals! If you want to protect the consumer, you really should be doing the opposite: All MD's should be overseen by a trained wholistic nutrition expert and naturopath! Not the other way around. MD's only know how to fix a very small subset of health issues based on a narrow subset of diagnostics (blood, urine, xrays and scans, spine taps...) anything else outside that falls into a "chronic disease" pattern for which only know how to prescribe drugs in virtual perpetuity. And these very drug themselves are a huge problem:

- In a June 2010 report in the *Journal of General Internal Medicine*, study authors said that in looking over records<sup>s</sup> that spanned from 1976 to 2006 (the most recent year available) they found that, of 62 million death certificates, almost a quarter-million deaths were coded as having *occurred in a hospital setting due to medication errors*.
- An estimated 450,000 preventable medication-related adverse events occur in the U.S. every year.
- The costs of adverse drug reactions<sup>s</sup> to society are more than \$136 billion annually -- greater than the total cost of cardiovascular or diabetic care.
- Adverse drug reactions cause injuries or death in one of five hospital patients.

The above disaster for ill people who go to an MD would never happen in the hands of a naturopath, because a naturopath's therapies are benign.

2) Aside from the basic incompetency and failure of MD's to actually heal people-- except for the obvious things such as infections, and biomechanical issues, heart stents etc... .. but these things that any naturopath will refer to the "regular" medical system --The government has no right to interfere with my choice of health care modalities, who and why I make those decisions and I certainly DO NOT want any MD with a very narrow allopathic background exercising any oversight of my alternative health care practitioner (naturopath, chiropractor, ayurvedic physician, chinese medicine doctor etc) decisions. If I need the help of a regular MD, I will (and have and do, when appropriate) make that decision myself.

If the government were to actually support alternative health care, foster research and provide insurance coverage, health care costs would drop dramatically! because people would actually get well! The only sector that would suffer would be the CEO's of drug companies who make money because of the fact the regular MD's don't know how to actually heal people and as a result they make you take medications "forever" for conditions that remain perpetually "mysterious" (e.g. after 100 years, the medical world still has no cure for arthritis... another colossal failure)

The following is also all true:

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

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Thank you.  
Thambynathan Kathir

Tanya Sheldrake  
13801 NE 401st Way  
Amboy, WA 98601

February 18<sup>th</sup>, 2014

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Thank you,

Tanya M. Sheldrake



We were shocked and dismayed to learn of this absurd legislative move to hamstring our nds. This will destroy the professionals ability to provide a range of care that they clearly are able to provide. this needs to be stopped! Sincerely, Joel Lillie and Angela Olivier 12-415 Puhala street Pahoia Hawaii 96778  
8084949694

Charmainge James

850 S Longmore #260

Mesa, AZ 85202

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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Thank you,

Charmainge James

Charmainge James

Candidate for Doctor of Naturopathic Medicine, 2017 Sout

February 18th, 2014

FM: CHASE POZZI  
1921 N Falcon Dr.  
Ridgefield, WA 98642

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Thank you,

CHASE POZZI



Dr. Rebecca Provorse

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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 currently a student at the National College of Natural Medicine. The proposed legislation in Hawaii is very concerning to me. This bill seems unnecessarily limiting to the practice of naturopathic medicine and the reasons as to why this bill is being proposed seem unclear. When there has not been cases of naturopaths overstepping their prescription bounds or harm done to patients - in fact only benefit - I have to question the motivation and underlying ethics for such a piece of legislation. One of my fellow students is from your great state. He is one of the brightest men I have ever met. He CHOOSE becoming a naturopath over accepting entrance into one of the best medical schools in the U.S. - OHSU. As naturopaths we receive four years of doctorate level education that includes comprehensive and thorough training on pharmaceuticals. Having a "MD" oversee the pharmacological prescriptions of naturopaths is insulting and unnecessary. The Hawaii Naturopathic State Board sets a high standard for the naturopathic doctors in the state and make sure that naturopathic practitioners are meeting their requirements. Limiting the efficiency and ability of naturopathic doctors to meet the needs of their patients seems short sighted and discriminatory. I have the utmost faith that Hawaii (who has pioneered the way in so many areas) will not let this legislation through.

Cameron O'Connell



Amy Terepka

February 18, 2014

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Thank you very much,

Diana Zitserman  
30 Suzanne Circle  
Fairfield, CT 06825

Wendyllynn M. Clark  
475 Wana'ao Road  
Kailua, HI 96743

February 18, 2014

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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.

Naturopathic care has increased my quality of life dramatically this last 16 months. I have been able to get off three medications all of which have long term adverse side effects. (Such as decreasing my bone mass). I also still see my primary care physician, *but would not want to COPAY or use unnecessary precious insurance benefits to "double check" or "block" or "impede" my naturopathic doctors plan.* My Naturopathic Doctor has increased my overall health and **prevented a host of unnecessary future hospital costs.** I am deeply grateful for their care. ACCESS AND TREATMENT TO ALTERNATIVE HEALTH CARE SHOULD BE OUR DECISION.

Thank you,

Wendyllynn M. Clark

I have been a patient of Dr Laurie Steelsmith for more than 20 years and she has helped me make changes to my life style to live a more healthy life. Unlike MDs who give you pills to alleviate the symptoms, she looks to the cause of the problem and tries to help me make the changes to eliminate the problem. She does not to be under the direction of an MD.

Stephen E. Chun  
94-618 Lumiaina St  
M101  
Waipahu, Hi 96797

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 on behalf of the Naturopathic Medical Students Association International 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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Thank you,

**Jamila James**, BHSc, Naturopathic Medical Student  
**VP of Legislation**  
Naturopathic Medical Student Association (NMSA)  
[www.naturopathicstudent.org](http://www.naturopathicstudent.org)

**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>
Mojo Mustapha	Individual	Oppose	No

Comments: With the horrendous prices of using traditional medical practices naturopathy is an alternative and should be encouraged with regulation rather than discouraged. Using nature and natural products to heal is an important bedrock principle. We should not lose sight of that. Mahalo

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

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To the honorable legislation people,

The sb2577 bill will cost me more money and time to have my primary care physician review what my naturopathic doctor Rx.

My primary care doctor does not have any training in naturopathic Rx or remedies. Not a clue.

My naturopathic physician has helped me attain true health. No sick days at work anymore!!!

I strongly oppose SB2577 SDI relating to Naturopathic Physicians

Sent from Wendy's iPhone

Danielle Amon-Wilkins  
PO BOX 6861  
Hilo, HI 96720

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,

Danielle Amon-Wilkins  
Hilo, Hawaii

18 February 2014

From: Emma Dexter

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

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

**SB2577 SD1 requires your Naturopathic Physician to have MDs review all of their prescriptions, including the amounts prescribed, and that these MDs would address any concerns they have with these prescriptions to the naturopathic physician and the board. This is an extremely ill-conceived proposal.** A naturopathic physician is a very different type of medical expert than an MD. With all due respect, MDs are not at all equipped to make sensible reviews of naturopathic prescriptions, because their education has few, if any, requirements for training in the use of naturopathic treatment modalities. The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care. Naturopathic doctors are highly trained to be independent providers who consult with other health professionals when they consider it appropriate for the patient, *not* when required by law to subordinate their expertise to individuals untrained in naturopathic medicine. In addition, requiring one type of doctor to oversee and review a very different type of doctor's practice would create endless implementation and legal problems when it comes to issues such as insurance, patient privacy, HIPAA laws, and much more.

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

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

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

Thank you,

Emma Jean Dexter



From: Tamara Spurr, 27-474 Old Mamalahoa Hwy, Papaikou, HI 96781

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

Hearing at 10

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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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,  
tamara spurr

**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
Christy Ceraso	Individual	Oppose	No

Comments: I have received important health care support for myself and for my children from Naturopathic physicians. I find them generally well rounded and highly informed, very careful as to what they prescribe, and very well educated and knowledgeable regarding allopathic as well as "alternative" perspectives on medicine. In other words: I trust them, and I see no reason to impose upon them restrictive laws that would ultimately drive them out of the state of Hawaii. In fact, what I want is to have them as a PCP choice in my health care insurance coverage. You will be doing not only the Naturopathic doctors, but also the residents of the state of Hawaii a great disservice if you pass this draconian Bill.

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

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Jill Steele  
RR 2 Box 3896  
Pahoa, HI 96778

I oppose SB2577 SD1 because it would limit the healing capabilities of Naturopathic medicine by imposing unnecessary restrictions upon them.

Naturopathic medicine is effective. When my daughter had meningitis, traditional medicine was not helping her to get well and get her energy back. The naturopath prescribed herbs and we noticed a difference right away. She was finally able to get off the couch and back into the world. I think we need all kinds of alternatives to choose from to heal ourselves.

Sincerely,  
Jill Steele

Michael Spackman  
P O Box 361  
Papaikou, HI  
96781

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:

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Thank you,

Dr. Elizabeth Korza  
Berkeley Naturopathic Medical Group  
2615 Ashby Avenue  
Berkeley CA  
94705

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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Thank you,

Dr. Elizabeth Korza  
Berkeley Naturopathic Medical Group  
[www.berkeleynaturopathic.com](http://www.berkeleynaturopathic.com)  
phone: (510) 845-8600  
fax: (510) 280-9318

Follow us on Facebook for daily recipes, health tips, research updates and more:  
<https://www.facebook.com/BerkeleyNaturopathic>

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Dr. Sherry LaBeck  
7237 N Vincent Avenue  
Portland, OR 97217

February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

I'm writing to request that you do everything in your power to oppose SB2577 SD1. This bill would essentially require naturopathic physicians to restrict or give up prescription rights that are essential to their services. I am a naturopathic physician in Portland, Oregon. Prescription rights are an essential tool for naturopathic doctors. The unreasonable restrictions proposed by SB2577 SD1 would seriously limit their ability to provide quality, low cost health care to their patients.

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 naturopathic physicians far exceeded that of any MD in

many areas essential to 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 patient access to the high level of naturopathic care that they deserve.

Thank you,

Sherry LaBeck, ND

[salabeck52@gmail.com](mailto:salabeck52@gmail.com)

503-285-2919

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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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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,

**Robert W. Brody**  
**University of Bridgeport**  
**N.D. & C.N.S. Candidate, Class of 2014**

I so enjoyed my last trip to the Big Island I sent a \$300 check to the department that takes care of the state parks. So beautiful and so happy to have access to so many places.

#### SB2577 SD1 Relating to Naturopathic Physicians

I have been a practicing naturopath since 1995 in WA state. I have been a primary care providers for all of that time with prescriptive authority but the list of the drugs we can prescribe has become longer. I don't have to have an MD for the allowed prescriptions and could get a DEA number if I desired.

There are many clients that just flat out won't seek medical care or advise from the MD/alloathic world. And many who's cares and concerns are brushed aside by MDs who don't understand a naturopathic approach. If you require patients to seek an MD's approval for naturopathic care you will reduce the number of people getting care. I see it alot. Now guess what-if a client comes into my office that needs a diagnostic workup or evaluation beyond what I can do-I SEND THEM TO AN MD. I want what is best for my patients. I can handle many many things without the conventional medical world and usually without prescription.

I don't write prescriptions very often. And I have no problem with a good drug properly prescribed. But there are times when it would just mean another office visit to another provider and who knows when that would happen or if they would even follow through. How long do you think it will take the MD to get back to me with approval? So it is very reasonable to have some prescribing authority. Perhaps you could see how many adverse affects come from ND prescription vs the rest of the prescribing world. There may be some bad apples in both camps- and they should be found. But most of my colleague are very thorough and cautious about their prescriptions.

In terms of what gets sold 'off the shelf' of my office-most of that is readily available from MULTIPLE sources on line or in Walmart. What ever restrictions you want to put on ND's you should also put on these resources. Again, check out deaths from nutritional products vs. prescription or even over the counter drugs. Do you have "health coaches" or nutritional consultants or personal trainers regulated similariy? Because trust me, they are selling tons of nutritional suopplements without much training.

Thank you for making a wise and reasonable choice in regards to SB2577

SB2577 SD1 Relating to Naturopathic Physicians

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Kaiten Rivers, ND  
3902 North 34th Street  
Tacoma, WA 98407  
253-572-0939 Fax: 253-572-5101  
[www.kaitenriversnd.com](http://www.kaitenriversnd.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 is my third follow-up letter regarding limiting the rights of naturopathic doctors as well as our rights as citizens of this state. I perceive that the reason you are pushing this bill is not to protect the rights of the people but to appease the notable medical doctors who are intimidated by the intrusion of other doctors onto their turf, so to speak. My naturopathic doctor has had 6 years of training at the Oregon School of Naturopathic Medicine. She has enough training to prescribe medication. We as citizens of this state should have the freedom of choice and not be tied down to only the opinions of the medical profession. The legislature should not have the power to tell us who we should listen to--that's paternalism or even worse dictatorship.

Regardless if individuals make the wrong choices, that's their rights as citizens of this great country. The all-powerful and know it all medical profession need to humble themselves and give room for freedom of choice.

We as citizen of this state are not little children being led by the hand to listen to legislators and medical doctors for our own good. You are not our parents, we are free thinking individuals. I am 65 years old and I've been through it all. If we don't want a medical doctor but prefer the skills of a naturopath or any other source then we should have that right to choose. Yes, but you say that sure we have the right the choose the naturopath but-- you are limiting his professional abilities. So what good is that for us?

For those individuals who have had negative experiences with certain naturopathic doctors then those doctors should be disciplined not the whole profession.

I don't get it, you pass a law to give homosexuals the freedom and right to marry but now you want to limit our rights and the rights of naturopathic doctors to practice their profession because you think it's for our own good.

It sounds like you have only heard the negative side of the naturopathic profession. But there is a positive side and I will vouch for it. Do not punish all naturopathic doctors by limiting their expertise. Do not overstep your boundaries as legislators into becoming overzealous "watchdogs".

Thank you,

Kathleen P. Holokahi

Kambra Phoebus

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.

--

Kambra Phoebus, ND

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

707-462-8628

[www.facebook.com/ukiahnaturopathic](https://www.facebook.com/ukiahnaturopathic)

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Aloha

My name is Janice Hanley Taketa and I have been using Naturopathic doctors for over 30 years. My present doctor is Dr, Laurie Steelsmith. I am one of many who use both Western and alternative medicine. I have been suffering for years with a particular disorder that only my naturopathic doctor was able to treat successfully.

It would be a great hardship to me and many many others if the care we receive from our naturopathic doctors was curtailed in any way.

Please do not pass this bill.

Sincerely,

Janice Hanley Taketa M.S CCC-SP

Duane Chavez

> 1478 N. 85th Street

> Scottsdale, Arizona 85257

> February 18, 2014

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> Position: Strong Opposition to SB2577 SD1

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> Relating to Naturopathic Physicians Hearing at 10:30 am on February 20th, 2014 in Conference Room 229

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> Thank you,

> Duane Chavez

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February 17, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians  
Hearing: 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 are not enough physicians in Hawaii to serve our health needs, and they do not offer the same approach as naturopaths.

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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Mahalo,  
Diane Koerner  
14-5027 Kapoho Bch Rd  
Pahoa, HI 96778

from: Esther Szegedy, Kea'au, 96749

Room 229

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Deborah Jones  
P.O.B.51  
Pahoa, HI 96778

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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I have cared for myself and my 18 year old daughter primarily with my Naturopathic Physician for all of her life and I value this immensely!

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Thank you,  
Deborah Jones

Dear Senator Rosalyn Baker and Senator Brian Taniguchi:

My name is Erik Cleveland. I have both two physicians. One physician is a M.D. and my other one is a naturopathic physician. I feel it is important to have both physicians so that I can receive the best health care. I like to use the services of my naturopathic physician since she has a holistic approach in prevention and in treatment.

I'm writing to request that you oppose SB2577 SD1. This bill would 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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Aloha,  
Erik Cleveland

From: Benjamin Caleda  
Address: 94-994 Hanauna St. 9G, Waipahu, HI 96797  
February 18, 2014  
Position: Strong opposition to bill SB2577 regarding 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:

This letter is being written to strongly oppose bill SB2577, which will require naturopathic physicians to restrict or give up prescription rights, which are essential to primary care practices. The basis of this bill is founded on the idea that naturopathic physicians are ill equipped, clinically and educationally, to prescribe pharmacological agents in comparison to doctors who have attended conventional medical school.

It is shown that medical students attending the National College of Natural Medicine and Bastyr University, who are fulfilling requirements for a naturopathic medical degree, achieve more or comparable education hours in medical sciences and pharmacology, in comparison to accredited medical schools in the United States.

<http://www.ncnm.edu/images/Factbook/Nat-Med-Ed-Comp-Curricula.pdf>

Naturopathic physicians trained in primary care are afforded education by accredited medical schools, approved by the American Medical Association. Having independent pharmacological prescriptive rights deemed appropriate by the Hawaii Naturopathic Formulary would facilitate an ND's function as a primary care provider for those who choose naturopathic medicine as such. It also is a proponent to holistic practice, a philosophy carried by naturopathic physicians, in which during some instance pharmaceutical agents may be appropriate treatments.

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,

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Benjamin Caleda  
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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:

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.

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 Ahn

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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. I believe this is a mistake, and may limit an important part of health care currently available to the people of Hawaii.

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

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

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

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

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

Thank you,  
David B. Derris, D.D.S.