

**LATE**

Soraya Applegate  
46-063 Emepela Place  
Kaneohe  
96744

February 20 , 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,  
S. Applegate

# LATE

Catalina Cain

P.O. Box 1673

Kapaau, HI 96755

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.

**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,

Catalina Cain, ChT

**LATE**

Naturopathic care for my 91-year-old grandmother has helped her through some difficult health problems after experiencing health crises and permanent iatrogenic debilities caused by treatment she received from her M.D., which she has been suffering from since pretty much a full year ago.

SB 2577's effect would be to be to regulate naturopathic care, as it now stands, out of existence in Hawaii. It would take away people's right to seek out this method of health care, leaving us with little choice about health care. It seems to be cruel and unusual punishment for those of us who've learned first-hand that there can be a good reason for, and good results from, seeking out the help of a naturopathic physician.

Thank you very much for reading this, and thank you, too, for your opposition to SB 2577.

Aloha,

Scott Sakaguchi

2034 Uhu Street

Honolulu, HI 96819

February 20, 2014

**LATE**

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

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**My naturopathic physician has effectively treated me for hormonal imbalances for which my medical doctor had no solutions or even suggestions.** Requiring an MD to review the prescriptions would have in all probability left me still suffering.

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

Thank you,

Beth Thoma Robinson  
PO Box 540  
Kapaau HI 96755

Chris Braun  
Dallas, TX

**LATE**

February, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

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



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

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

Thank you,

Chris Braun  
215-917-5179

# LATE

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

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

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

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

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

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

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

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

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

naturopathic physician far exceeded that of any MD in many areas essential to my health care.

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

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

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

Thank you,

Kathryn Henry

**LATE**

Heather Sullivan 2310 Umi Place Haiku HI 96708

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

Aloha,

Hopefully after reading this short research based commentary on SB2577SD1, you will see the awareness, scientific and common sense failure behind this proposed bill and immediately stop the bill.

It is greatly disturbing to see such a lack of awareness and lack of common sense being applied to limit the benefits of naturopathic healing for our greater ohana. Naturopathic Medicines and other previously called "Alternative Medicines" are now considered "Complimentary Medicines", because they support each other. This bill is no "Compliment" or vote of confidence in the value of Naturopathic Physicians or their natural commonsense based care. It is actually the opposite and counter to the direction of mainstream research, showing that we abandoned nature and our own empowerment potential being overly sucked into the benefit's without awareness of the risks of Allopathic medicine.

As a therapist and son of a well recognized psychiatrist, Dr. Barry Blackwell, I have decades of experience in what I am speaking of, especially since my primary focus was inpatient psychiatric rehabilitation. I watched as clients were unawarely diagnosed and prescribed Allopathic medications for chemical imbalances supposedly of genetic or structural defect origin, that could not be proven. Intrusive medications were handed out like candy, especially Prozac, with short and potentially unknown long term devastating effect to the nervous system and all body systems.

The Amish Study that Allopathy relied on was never able to be duplicated and later seen as flawed research and based on chance findings. We can't take a "Chance" on our health, can we? We previously hypothesized SSRI antidepressants were correcting an out of control fight or flight response in the hindbrain. Before the study to prove that, I hypothesized the complete opposite, that the forebrain was trying to deny and exhaustively out-think its way out of its own natural protective stress response and appropriate adaptive performance anxiety. The research PET scans afterwards showed mainstream belief to be completely wrong, as the disrespected hindbrain was falsely judged and we attempted to limit its powers. The overactive misdirected forebrain was put to rest by the medications so the hind brain and fight or flight could do its job.

Allopathy, by trying to limit Naturopathy, is acting like an unaware forebrain, being over impressed with itself and unawarely trying to limit the power of its most valuable asset of the Hindbrain. Naturopathy is less intrusive, more aligned with nature with much less risk of side effects.

It would seem that the complete opposite should be our focus. Education of Allopathic doctors to first empower clients to optimize their own awareness and Stress Response first, then try natural non-intrusive remedies, then as a last resort turn to the power of Allopathy, with its inherent risks. "Common Sense" anyone? Good risk management anyone? Empower our Ohana for optimum health, relationships and futures without excessive risk and dependency anyone?

To support Mr. Green in his own apparently blind unaware approach to attempting to limit the benefits of Naturopathy to the community, is like going back to "Blood-letting" and "Trephining". It is primitive, self-serving, and completely against modern awareness and research findings.

He should immediately correct his awareness failure and withdraw the bill or be removed from the process due to a blatant conflict of interest and the bill be stopped by the mere use of simple logic and common sense supported by recent scientific research. Mr. Green has obviously not updated his own awareness with a thorough search of current research. Not good Mr. Green. The beauty is you can instantly change that with this new information and common sense and become part of the solution, not the problem!

If I can be of further support and provide testimony directly or indirectly to prevent ten steps back in the progress of empowering the human family to optimize health, relationships and futures together in aloha, please let me know.

Sincerely and with Aloha,

Martin Blackwell, Behavioral Health Specialist with Optimum Health Management  
808-989-9849

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"Happiness is a Choice...Period." <http://www.youtube.com/watch?v=jgflMBklRkI>

"Life is merely a momentary shift in our fear/hope quotient..."

Let go; don't hold the past hostage for your present discomfort, for you alas will be its prisoner..."

"To approach or to avoid ... that is the question" ... approach avoidance theory ... the theory of everything ... it explains everything ... approach it or avoid it ... your choice ... always ...

**LATE**

**David Sutton**  
**PO Box 1159**  
**Kilauea, HI 96754**

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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I have used Naturopathy for over 30 years and I wish to continue unimpeded!

Thank you for your time and attention to this important matter!

David Sutton

**LATE**

**SB2577**

Submitted on: 2/19/2014

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

Submitted By	Organization	Testifier Position	Present at Hearing
Joni Sadler	Individual	Comments Only	No

Comments: I am opposed to this bill. It seems to me to be another attempt to discredit health professionals that don't subscribe to the AMA and their dictates. I have been using naturopaths for many years. I am in good health, and he does prescribe my thyroid medicine.

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)

**LATE**

February 19, 2014

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

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

Thank you,

Tina V. Floyd  
15-2698 Ina St.  
Pahoa, 96778  
808-937-0392

--

"It's hell being a visionary."

--Hope Springs

# LATE

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

Donna Mitts  
PO Box 344  
Pa'auilo, HI 96776

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

Thank you,

*Donna Mitts*

# LATE

Donna Mitts  
PO Box 344  
Pa'auilo, HI 96776

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

Thank you,

*Donna Mitts*

**LATE**

**From:** [nanci.helfrich](#)  
**To:** [CPN Testimony](#)  
**Subject:** I strongly oppose SB2577 SD1 relating to Naturopathic Physicians  
**Date:** Wednesday, February 19, 2014 8:50:13 PM

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

My family and I chose a naturopathic physician as our care provider for many reasons. While we have always believed in a natural approach to medicine, we were severely mistreated in the hospital after the birth of our daughter. Our healthy baby was kept in the NICU against our will, while we were repeatedly threatened with a call to CPS when we tried to protect her. Finally after several exhausting days in the hospital, which should have been spent at home bonding with our child, we were presented with a safe option. Transfer care to an outside provider, Dr Lori Kimata. She has been our doctor ever since and we trust her with our family's health. Neither my wife or I have any interest in the input of an MD.

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

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

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

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

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

Thank you,  
Michael Schmidt



# LATE

Dear Senators,

I am writing in opposition to the bill SB2577SD1 which would retract prescriptive authority for Naturopathic physicians. I am a naturopathic physician and have been in practice in Hawaii since 2000. Since the passing of our prescriptive authority in 2010, I have felt like I have finally been able to exercise the full capacity of the primary care role that we were trained to provide. This has been especially important in a community where many of my patients can not find primary care physicians with space in their practice.

Most of the prescriptions that I provide are within 1-3 of our current formulary as well as parental and IM vitamin therapy. That said, I have found instances where patients who have lost their primary care physicians who need refills on important medications and by providing short term refills, I have provided continuity in their care while they try to establish a PCP.

I feel as a profession we are aware of our PCP role and rely heavily on the integration of care with other primary care doctors and specialists. I believe it is this training that has resulted in so few abuses of prescriptive authority in other licensed states. I do support the inclusion of continuing education with a focus in pharmacy.

Thank you for your time and service,

Michaela Martin ND, L.Ac  
Kamuela HI

From Shannon Comstock

February 19 , 2014

**LATE**

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.

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Thank you,  
Shannon Comstock

From Shannon Comstock

February 19 , 2014

**LATE**

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,  
Shannon Comstock

Janet Lipps  
75-938 Hiona St.  
Holualoa, HI 96725

**LATE**

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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Thank you,  
Janet Lipps

# LATE

**SB2577**

Submitted on: 2/19/2014

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

Submitted By	Organization	Testifier Position	Present at Hearing
Dana G. Moss	Individual	Oppose	No

Comments: Leave our doctors who don't subscribe antibiotics like candy and for viruses alone. There are far more better ways to heal than just the pill pushing doctors. I have used natural homeopathic remedies and prescriptions for myself and family for over 40 years with awesome results and never one negative side effect. For a pharmaceutical to be a pharmaceutical it MUST HAVE A OVER DOSE LEVEL & HAVE A TOXICITY LEVEL. Please don't limit my choices & ability to keep me & my family healthy. OPPOSE this bill at all cost!

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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**LATE**

Dear Honorables,

Having used the services of naturopathic doctors for my entire time in Hawaii (almost 24 years), I implore you to oppose SB2577 and ANY bill that would disallow their services in our state.

I would not be alive now, if not for the care I first received from an ND on Oahu 24 years ago. Continually, my health has been enhanced by their services, so that I am healthier than all other members of my family at this time. Since I am allergic to many medicines, being able to see an ND is the only way I can take care of my health.

We need alternatives now more than ever, with so many people suffering from allergies to medicines, and even dying from medicines that were prescribed by MDs.

Please do not take the right of naturopathic doctors to practice to the full extent in the state of Hawaii. Oppose SB2577 now.

Thank you,

Patti Valentine  
PO Box 194  
Kapaa, HI 96746  
Kauai

--

"The question is not whether we will be extremists, but what kind of extremists we will be...The nation and the world are in dire need of extremists." -- Rev. Dr. Martin Luther King Jr.



**LATE**

We want the right to choose our healthcare and oppose this bill.

Peace...

:) Teri

**\*\*DISCLAIMER: PUBLIC NOTICE: PRIVATE: This is Not A Public Communication! This private email message, and any attachment(s) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, and is for the sole use of the intended recipient and contains privileged and/or confidential information. With explicit reservation of all My rights, without prejudice and without recourse to any of My rights. Notice to Principal is Notice to Agent / Notice to Agent is Notice to Principal\***

**LATE**

**SB2577**

Submitted on: 2/19/2014

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

Submitted By	Organization	Testifier Position	Present at Hearing
Lisa Kirbin	Individual	Oppose	No

Comments:

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# LATE

**From:** [tj.simms](#)  
**To:** [CPN Testimony](#)  
**Subject:** Oppose BILL SB2577  
**Date:** Wednesday, February 19, 2014 6:51:36 PM

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Oppose BILL SB2577

**LATE**

**From:** [Lisa Kirbin](#)  
**To:** [CPN Testimony](#)  
**Subject:** SB2577 OPPOSE  
**Date:** Wednesday, February 19, 2014 6:47:11 PM

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Leave alternative medicine alone!

**LATE**

**SB2577**

Submitted on: 2/19/2014

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>
penny s	Individual	Oppose	No

Comments:

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

# LATE

I have enjoyed good health with the aid of Naturapathic Dr.s . I choose to prevent illness in the first place and their guidance has kept me on this path. I do not use the medicine of allopathic dr.s it has given me complications and more problems. If we are to live in a free country we must have a

Choice. We all know the drug companies have an outrageous record in every direction. I was an Occupational therapist /psych I am now a cranial therapist because it offers much more to the patient. These preventive measures of guiding people to healthy life styles is needed more than ever before. Really, obesity, depression , heart. Problems at all time high. Who has not noticed? Healthcare costs can only be brought with healthy living

Dr.s are trained to provide this. And they are too busy caring for those who do not live healthy and are in critical conditions.

I urge you to vote down this bill 2577 and support healthy lives.

Bonnie stevenson  
Feb. 19, 2014

Cindy Azevedo  
33 Fairbanks Avenue  
East Taunton, MA 02718

February , 2014

**LATE**

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,  
Cindy Azevedo

# LATE

Aloha.....we live in a natural awesome environment and we will like to keep it that way....to connect with nature and pure mana.  
we will like to go back to the time where people were heal with herbs and natural ways.  
please.....consider the opinion of many of us in kauai.....mahalo...jennifer



Rachel Chambrella  
94-1042 Oli Loop  
Waipahu, HI 96797

February 19, 2014

**LATE**

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Thank you,  
Rachel Chambrella

Jewel Shell  
73-1192 Kaiminani Drive  
Kailua Kona HI 96740  
February 19, 2014

**LATE**

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

Thank you,

Jewel Shell  
[jewel1944@msn.com](mailto:jewel1944@msn.com)

Aloha, To Whom It May Concern,

"Although I do not have a Naturopathic Doctor, I have friends that do, and they've had excellent results with conditions that the regular M.D.'s have been unable to diagnose or treat. Seeing a licensed N.D. as a primary care provider should be a right of all residents of Hawaii. The scope of the naturopath's practice should not be reduced. They play a vital role in keeping our community healthy."

Devon Geis

>  
>  
>  
>

Robyn Thompson  
Vancouver, Washington 98662  
February 18<sup>th</sup>, 2014

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

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Thank you,  
Robyn Thompson  
360-609-5008

# LATE

- Regarding SB2577SD1
  - At issue:
    - What is the motivation for such onerous legislation?
    - There have been no cases of harm, mismanagement, or prescribing impropriety against an ND's care brought to the Board since we gained prescriptive authority on January 10, 2010. (In fact, no Board action has been brought against a practicing ND in the last 30 years, since our longest practicing NDs have been in Hawaii)
    - There is no precedent for such regressive legislation in any other state where NDs have prescriptive authority.
    - Misguided approach to force NDs into a subordinate role and to limit their scope of practice, while burdening MDs and the Board, and with NDs playing an increasingly important role (dating back to 1927), with the increasing need for more well-educated, well-trained, well-equipped primary care docs in Hawaii to fill the void.
    - Even with comprehensive and comparable educational standards as independent primary care providers, NDs throughout the Islands, cooperate, consult and maintain positive relationships with other health professionals and MDs when it is in the best interest of the patient.
  - Pharmacology Knowledge
    - NDs have comparable hours of pharmacology courses to other medical prescribing professionals. (# ?)
    - 1994 Legislative audit resulted in discontinuing CE. Most NDs attend continuing ed courses on their own, that include pharmacology.
    - HSNP proposes, 15 CE biennially. (Adequate and sufficient! Under the organization of the local HSNP, approval by national AANP and reviewed by ND Board)
  - Pharmacology Application
    - 2010 Board members, Drs. Traub and Kern, met with pharmacy board in a cooperative effort to answer questions regarding ND prescribing patterns and to present a unified paper that would be distributed to all pharmacists.
    - Prescribing patterns, specifically as it related to **medical specialty medication**, was used in our formulary primarily in supporting and transitioning patients eventually wanting to be weaned from medication to other effective forms of health care. We also informed members that there are specialty practices within naturopathic medicine but that the former rationale was primarily true.
  - Naturopathic Formulary should remain as it is, with the Board retaining the authority to add or delete any items on the formulary as experience demands.
    - Board has adopted **Standards of Practice and Care** that set higher standards for NDs, for competence and safety, than any other state in the country.
    - Section **16-88-80(a)(6)(A), Hawaii Administrative Rules**, requires that a naturopathic physician shall maintain proficiency and competence, and be diligent in the provision and administration of patient care.

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

- appropriate.

I would like it to be known that I have never been made well using the AMA route, since all that seems to happen is a prescription for drugs to alleviate the suffering, but never addressing the real issue that is causing the suffering. Only through my Naturopathic doctors have I ever been truly healed.

Ruth Ota

**Submit testimony to [CPNTestimony@Capitol.hawaii.gov](mailto:CPNTestimony@Capitol.hawaii.gov) no later**

# LATE

**From:** [Marcus Busekrus](#)  
**To:** [CPN Testimony](#)  
**Subject:** Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians  
**Date:** Wednesday, February 19, 2014 2:29:08 PM

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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 oppose SB2577 SD1. It is shameful that our local government wastes its time trying to invent new legislation to restrict the freedoms of the people of Hawaii when there are so many other pressing issues that are un-addressed.

Our roads are in need of repair, and the debate over whether the State or the Counties have jurisdiction over road repairs has NOT BEEN RESOLVED IN 100 YEARS, yet you are wasting time on stupid paternalistic legislation like SB2577.

Our land is being liquidated and sold to foreign investors, marketed to tourists, displacing low-income locals and forcing them to move to Waianae, yet you think preventing interfering with the people's right to choose their health remedies is a more pressing issue.

Whose hands are in whose pockets? Who benefits from your cronyism? Who is financing your campaigns? Do not think for a second we are not scrutinizing you. Do the right thing.

**LATE**

**SB2577**

Submitted on: 2/19/2014

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>
Toni Withington	Individual	Oppose	No

Comments: I use a highly qualified naturopathic doctor in addition to my AMA doctor for treatment. They are not competitive, they cooperate in giving me the best care possible. I strongly oppose this bill as it makes a judgment about what medical care is best for me. Leave the laws regarding naturopathic care alone.

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)

February 18, 2014

**LATE**

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

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

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

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Thank you,  
Morgan DeVoe, N.D.  
254 St. John Street  
New Haven, CT 06511



**LATE**

Your Name /Address

February , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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Thank you.

Bart Walton  
Kauai, HI  
808-346-9330

Michael Swerdlow

POB 384192 Waikoloa HI 96738

**LATE**

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 **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. This bill favors big drug  
companies over natural herbs and supplements. It would also  
restrict 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.

---

Christina Struble/[christina.struble@bastyr.edu](mailto:christina.struble@bastyr.edu)

February 17, 2014

**LATE**

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

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

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

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

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

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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,

Christina Struble

**LATE**

**From:** [mike.swardlow](#)  
**To:** [CPN Testimony](#)  
**Subject:** SB2577 SD1  
**Date:** Wednesday, February 19, 2014 1:18:46 PM

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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:**

**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,



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

**LATE**

Laura Black  
340 Aulike Street  
Lahaina, HI 96761

February 19, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

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

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

Thank you,

**Laura Black**

Samantha Larkin

February 19, 2014

Position of Testimony: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians  
The hearing for this measure is at 10:30 am on February 20th, 2014 in Conference Room 229

**LATE**

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

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

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

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

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

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

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

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

Thank you,

Samantha Larkin,  
Naturopathic Medicine Doctoral Candidate 2017  
BASTYR UNIVERSITY  
California  
<http://www.bastyr.edu>

Erika Shickle

PO Box 497

Kapaau, HI 96755

February 19 , 201

**LATE**

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,

Erika Shickle

**LATE**

Janine Kuahine  
1432 Olin Street  
Honolulu, HI 96818  
February 19, 2014

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

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

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

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

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

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

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

Thank you,  
Janine Kuahine



Kim Wolforth

1564 Leilehua St.

Hilo HI, 96720

February 19, 2014

**LATE**

Position: **Strong Opposition** to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

Thank you,

**LATE**

Aloha, Thank you for taking the time to read my testimony.

I am in strong favor of naturopaths, their education and their ability to prescribe what they believe is beneficial for their patients. I have been helped many times by naturopaths for disorders that physicians simply had no resource to help with or kept prescribing antibiotics for same condition that kept returning.

I believe there is a time and place for all medicines. If I were to get in a car accident, please send me to the ER and I will be grateful for the knowledge and care the physicians and staff have around me.

However, cases like my daughter, diagnosed with... IBS? maybe. At 8 years old she started having bouts of vomiting, headaches, abdominal cramps.

It wasn't till I went to a naturopath that they tested her for allergies ( a test that differs from medical doctors) that we found out she was allergic to wheat. She was put on an elimination and anti-inflammatory diet, given the supplements and three months later we were out of crisis mode. Six months later her intestines were healing and we could introduce various foods back into her diet. A year later ( on a wheat free, dairy free diet) she is nearly symptom free. The average physician does not have the training naturopaths do in food medicine . nutrition and herbs. Most physicians are only required one class in nutrition.

As a country we need to be headed in a more comprehensive medical system that fits all our needs. Please do not limit, but if anything expand. I have seen first hand how valuable their knowledge is. Mahalo for your time, tar mattes

Allen Williams  
HC 1 Box 180  
Hana, HI 96713

**LATE**

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.

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Thank you,

Allen Williams  
Sent from my iPhone

**LATE**

Hannah Schuchmann  
2925 Booth Rd.  
February 19, 2014

My Position: Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In conclusion, I would like to add my personal story about how wonderful my experience has been with my ND, Dr. Kristen Coles with Steelsmith Natural Healing Center. I was recently diagnosed with very high cervical dysplasia, CIN III, something that if not treated could progress to invasive cervical cancer. While conventional Western medicine often prescribes the leap procedure, where an electrically charged wire is used to cut away abnormal cells, I wanted to explore other treatments. Dr. Coles is not only successfully treating me for this disorder, the way in which we are going about it considers the entire body. Supplements and escharotic treatments to fight off the HPV virus which causes the abnormalities. We are expecting a normal pap smear and complete healing of my cervix in 10 weeks time. I cannot even imagine losing my rights to choose this holistic way, considering my MD was telling me I had to get the leap procedure. Dr. Coles is literally saving my life, and I can't imagine why anyone would want to pass a bill that takes away their ability to really help people and change their lives.

Sincerely,

Hannah Schuchmann

**LATE**

**SB2577**

Submitted on: 2/19/2014

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>
jw nalda	Individual	Oppose	No

Comments:

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

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**LATE**

**SB2577**

Submitted on: 2/19/2014

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>
Kaliko Amona	Individual	Oppose	No

Comments:

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

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**LATE**

February 19, 2014

Mary Louise Uchida  
3511 Kepuhi St.  
Honolulu, HI 96815

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.

As a two-time cancer survivor, I want you to know that the care I received from my naturopathic Physician helped me get through my chemotherapy and radiation treatments more easily.

Please do not tie the hands of these well-trained and well-qualified naturopathic physicians. Please do not even consider passing SB2577.

One more comment: Hawaii is a progressive state. Why do we want to make our state less progressive than some other states which are now recognizing naturopathic care, and expanding rather than limiting their capabilities? Other progressive states are starting to realize that naturopathic care is valuable, viable, and even worthy of insurance coverage. Why not Hawaii?

Thank you for your consideration.

Mahalo,  
Mary Louise Uchida



**LATE**

**SB2577**

Submitted on: 2/19/2014

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>
Shannon Rudolph	Individual	Oppose	No

Comments: Oppose. This bill sounds like the old fight between the AMA and chiropractors; a turf war.

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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Fabriann Gin  
5238 Kuaiwi Place  
Honolulu, Hawaii 96821

February 18, 2014

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

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

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

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

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

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

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,

--

Fabe Gin  


*Logic will get you from A to Z. Imagination will get you everywhere. -Albert Einstein*

**LATE**

Glendora Guy

Kailua Kona Hi 96740

February 19 , 2014

**LATE**

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,

Glendora

Margaret Dexter, BSc Nutrition, ND

Licensed Naturopathic Medicine

LiveLifeWell [doctordexter.com](http://doctordexter.com)

Hi,

Thank you for taking the time to read the below:

**LATE**

Adam and Serena Silberman  
1146 Nimbus Lane  
San Diego, CA 92110  
February 18, 2014

Position of Testimony: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians  
The hearing for this measure is at 10:30 am on February 20th, 2014 in Conference Room 229

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

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

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

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

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

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

The education of my naturopathic physician far exceeded that of any MD in many areas essential to my health care.

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

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

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

We regularly travel to Hawaii and are planning on migrating to the islands. We would no longer consider it a place to live if we could not have our Naturopathic Physician continue to treat us and our family in the same capacity as they currently are ... extremely well!

Thank you,



Adam and Serena Silberman

Matthew Wall  
12718 Torrey Bluff Dr.  
San Diego, CA 92130

**LATE**

February 19, 2014

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

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

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

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

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

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

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

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

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

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

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

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

Thank you,

Matthew Wall

**LATE**

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:

**Dr. Benjamin Rush, a founding father as well as a signer of the U.S. Constitution was quoted at the time the constitution was being written as follows,**

**“Unless we put medical freedom into the Constitution, the time will come when medicine will organize into an undercover dictatorship to restrict the art of healing to one class of Men and deny equal privileges to others; the Constitution of the Republic should make a Special privilege for medical freedoms as well as religious freedom.”**

**Please consider the above quote as well as the below testimony when considering SB2577 SD1.**

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

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

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

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

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

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

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

Thank you,  
Gregory T. Treese

Jennifer Champion, MS/ 1034 E. Ranchcreek Road, Covina, CA 91724

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

**LATE**

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

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

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.

In Good Health,  
Jennifer Champion  
Functional Nutrition Practitioner  
[www.NeoGenesisNutrition.com](http://www.NeoGenesisNutrition.com)  
626.665.5490

**LATE**

Linda Lu  
94101 kaaka pl Waipahu, HI  
96797  
February 18, 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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

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

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

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

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

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

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

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

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

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

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

Thank you,

LINDA LU



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:

**LATE**

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> Thank you,

--

Barbara Johnson  
16-2050 Azure Dr.  
Pahoa, Hawaii 96778

Deborah Manzano/11 Waihilii Place, Kihei 96753

February 19, 2014

**LATE**

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,

Deborah R. Manzano, CCT  
Rhonda Collins, Office Manager, CTA  
Maui Holistic Garden Center  
808-281-5457  
website: [mauiholisticgardencenter.com](http://mauiholisticgardencenter.com)  
***"Life & Death Starts in the Colon"***

Sarah Snow  
HC 1 Box 180  
Hana, HI 96713

**LATE**

February 19, 2014

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Thank you,

Sarah Snow

**LATE**

To: Senate Committee, Commerce and Consumer Protection  
From: Ron Roberts, Waikoloa  
Subject: SB2577

I urge you to oppose bill 2577 which would restrict my Naturopathic MD's ability to care for my health. I am a 73 year old relying on my Naturopath MD to keep me healthy and happy. I feel fortunate to still be in great health and not rely on pharmaceuticals- thanks to Naturopathy.  
Warm Aloha, Ron Roberts (808) 937-2202

# LATE

Dear Hawaii Legislature or other interested parties,

**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,

Andrea Williams, ND

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

Andrea Williams

5631 NE 30th Ave

Portland OR 97211

February , 2014

Position: Strong Opposition to SB2577 SD1 Relating to Naturopathic Physicians

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Thank you,

Andrea Williams

# LATE

I WOULD LIKE TO TESTIFY ON BEHALF OF NATUROPATHIC DOCTORS-

I HAVE UTILIZED CARE FROM NATUROPATHIC DOCTORS MANY TIMES ALONG WITH OR WITHOUT AN MD

THE CARE HAS BEEN HIGHLY EFFECTIVE, ETHICAL AND APPROPRIATE.

I AM A REGISTERED NURSE AND A MOTHER OF 2. NATUROPATHIC DOCTORS

IN MY EXPERIENCE HAVE STAYED IN THEIR EXPERTISE AND SHOULD BE GRANTED THE RIGHT TO

CONTINUE TO DO THE WORK THAT THEY TRAINED SO HARD FOR AND HELP AS MANY PEOPLE

AS POSSIBLE WITHOUT MORE RED TAPE.

THANK YOU !

SINCERELY,

DEANNA SUMMERS

Adele Sakoda  
3511 Kepuhi Street  
Honolulu, HI 96815  
February 19, 2014

**LATE**

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My family and I have greatly benefited from the dual practices of both naturopathic and allopathic medicine. Our naturopathic doctors have brought the very best of their extensive training and knowledge to assist my mother in her recovery from major surgery and my aunt from the devastating effects of cancer and subsequent chemotherapy. We trust our naturopathic doctors from personal experience. As adults in a democratic society we have every right to choose which kind of care we will receive. This bill would severely undermine the practice of naturopathic doctors and as a direct result our healthcare choices.

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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Thank you,  
Adele Sakoda

Sent from my iPad



Mary Smithe  
Address: PO box 354 Anahola HI 96703

**LATE**

February , 2014

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Thank you.

Much Love, Light & Cookies!

XOXO,  
Mary Astor Smithe  
President and CCO  
Chief Cookie Officer

Chicago Butter Cookies, Delicious LLC  
"Cookies are like kisses...you can never have too many"

Marika Metz-Hall  
98-1319 Kulawai Street  
Aiea, Hawaii 96701

**LATE**

February 19, 2014

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Consumer Protection:

I am writing you to voice my strong opposition to SB2577 SD1. This bill would require naturopathic physicians to restrict or give up their prescription rights, which are essential to their services.

As a resident of the State of Hawaii, I have enjoyed the freedom of being able to choose how I would like to be cared for when it concerns my health and well being and this bill will greatly reduce my choices. I go to my MD for care in certain aspects relating to my health and I see my ND for other areas where my health and well being are concerned. I would not want my MD to oversee my ND just as I would not want my ND to oversee my MD. I have full respect and confidence in their abilities in their respective fields which are unique to their professions. The Naturopathic accredited universities in the US are classified as medical school programs by the federal government and the training is four years of post-graduated education and must pass multiple sets of national board exams and have comparable training in pharmacology to MDs and DO's.

My question to the Committee is...Why fix something that is not broken? The State of Hawaii has always landed in the top 5 in national surveys for being the healthiest state so this is not an area that needs change.

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.

As a resident of Hawaii I want to keep the right to CHOOSE who I want to oversee my health and well being and prescribing medicine and naturopath doctors are more than qualified to prescribe medications and are less likely to over-prescribe since they take a holistic and natural approach to healing. Let's move forward and not take a giant step backwards!

Respectfully yours,  
Marika Metz-Hall