



# SB2332

Measure Title:	RELATING TO NATUROPATHIC MEDICINE.
Report Title:	Naturopathic Physicians; Controlled Substances; Naturopathic Formulary; Testosterone; Prescriptive Authority
Description:	Authorizes a naturopathic physician to prescribe controlled substances that are consistent with naturopathic medical practice. Clarifies that narcotic drugs shall not be included within the naturopathic formulary.
Companion:	<a href="#">HB2256</a>
Package:	None
Current Referral:	PSM, CPH
Introducer(s):	BAKER, ENGLISH, KEITH-AGARAN, KIDANI, RUDERMAN, Espero, Gabbard, Ihara, Nishihara, Taniguchi

**PRESENTATION OF THE  
BOARD OF NATUROPATHIC MEDICINE**

TO THE SENATE COMMITTEE ON  
PUBLIC SAFETY, INTERGOVERNMENTAL, AND MILITARY AFFAIRS

TWENTY-EIGHTH LEGISLATURE  
Regular Session of 2016

Thursday, February 11, 2016  
1:15 p.m.

**TESTIMONY ON SENATE BILL NO. 2332, RELATING TO NATUROPATHIC  
MEDICINE.**

TO THE HONORABLE CLARENCE K. NISHIHARA, CHAIR,  
AND MEMBERS OF THE COMMITTEE:

My name is Constance Cabral and I am the Executive Officer of the Board of Naturopathic Medicine (“Board”). The Board thanks you for the opportunity to present testimony on Senate Bill No. 2332, Relating to Naturopathic Medicine. For the reasons set forth below, the Board supports this measure, subject to certain important amendments.

Senate Bill. No. 2332 authorizes a naturopathic physician to prescribe controlled substances that are consistent with naturopathic medical practice and clarifies that narcotic drugs shall not be included within the naturopathic formulary. Regarding controlled substances, the Board suggests that the bill be amended to provide that prescriptive authority of controlled substances be limited to testosterone rather than all controlled substances, and agrees that narcotic drugs should not be included within the naturopathic formulary.

Thank you for the opportunity to provide testimony on Senate Bill No. 2332.

Testimony In Support of SB2332  
To Hawaii Senate Committee on Public Safety & Military Affairs (PSM)  
February 10, 2016

Honorable Chair Nishihara, Vice Chair Espero and Members of PSM:

The Hawaii Society of Naturopathic Physicians supports this bill to expand prescription privileges to Naturopathic Doctors (NDs) to include controlled substances, except narcotics.

Naturopathic Physicians in Hawaii are gaining more public recognition as Primary Care Physicians (PCPs), evidenced by recent efforts to credential NDs as PCPs with HMSA, Hawaii's largest health insurance group, now in the final stages of administrative paperwork. Proper continuity of care for patients of NDs would be enhanced by increasing prescriptive authority to include controlled substances in keeping with Naturopathic practice.

It is interesting to note that the majority of NDs in Hawaii graduated from Naturopathic medical schools in Oregon, Washington and Arizona, states where prescriptive authority for NDs includes controlled substances. Treatment records at their clinical training sites indicate the judicious and careful use of controlled substances. Here in Hawaii, there are no reports of prescriptive misconduct by NDs.

Naturopathic Physicians are trained to provide safe and effective alternatives for pain relief, and can therefore provide solutions to the rampant overprescribing of narcotic pain medication. Proper hormone balancing, that may include the controlled substance testosterone, is one example of such alternatives in some cases among both men and women with musculoskeletal pain and dysfunction. Many other examples exist, of course, in which no medications are necessary, but NDs will be able to better manage their patients that do require non-narcotic controlled substances with this passage of this bill.

Thank you for the opportunity to testify,

Dr Karen Frangos  
President and Legislative Committee Chair,  
Hawaii Society of Naturopathic Physicians  
P.O. Box 941  
Kihei, HI 96753  
p: 808-891-1111  
f: 808-442-9938  
e: [hawaiiind@gmail.com](mailto:hawaiiind@gmail.com)  
[www.hawaiiind.org](http://www.hawaiiind.org)



To:

COMMITTEE ON PUBLIC SAFETY, INTERGOVERNMENTAL, AND MILITARY AFFAIRS

Senator Clarence K. Nishihara, Chair

Senator Will Espero, Vice Chair

DATE: Thursday, February 11, 2016

TIME: 1:15 p.m.

PLACE: Conference Room 229

From: Hawaii Medical Association

Dr. Scott McCaffrey, MD, President

Dr. Linda Rasmussen, MD, Legislative Co-Chair

Dr. Ronald Keinitz, MD, Legislative Co-Chair

Dr. Christopher Flanders, DO, Executive Director

Lauren Zirbel, Community and Government Relations

**Re: SB 2332**

**Position: OPPOSE**

Hawaii Medical Association opposes this legislation.

HMA oppose Naturopathic Physicians being able to prescribe controlled substances, as these drugs are highly addictive and dangerous. The training of Naturopathic Physicians is not consistent with the responsibility of prescribing controlled substances. Drugs are scheduled because of the amount of harm they can cause and the potential for them to be abused. Providers who are not properly trained should not prescribe these drugs. Current statute relating to NP's is very unusual, in that it does not require NP's to have their prescriptions reviewed by Medical Doctors and that their formulary is extraordinarily broad. We do not support expanding this formulary and would support substantial reduction of this formulary as that would be in line with the training of NP's.

In order to prescribe controlled substances MD's and DO's must gain entrance into very competitive 4 year Medical Schools, pass very rigorous courses and exit exams and complete 2 to 8 years of extra residency training.

The medical community has established these training requirements for licensure of physicians because correctly diagnosing and treating an individual can be the difference between life and death. Young physicians learn how to correctly diagnose and treat illness through intensive science and biology curriculum and years of concentrated hands on **supervised** clinical training.

**OFFICERS**

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**IMMEDIATE PAST PRESIDENT – ROBERT SLOAN, MD, SECRETARY - THOMAS KOSASA, MD,**

**TREASURER – MICHAEL CHAMPION, MD, EXECUTIVE DIRECTOR – CHRISTOPHER FLANDERS, DO**

Now that it is legal for Naturopaths to call themselves Physicians in Hawaii, and to prescribe almost all drugs in Hawaii, it will be **very confusing for patients to differentiate who to listen to about which drugs and treatments they need.**

**NDs are only required to take 7 credits of 'pharmacology' for graduation.**

Multiple state legislative reports have unearthed specific shortcomings in the education, training and competency testing of naturopaths:

1. The Colorado Office of Examination Services found in 2005 that “[T]here is little generalizable evidence that NPLEX2 Part II clinical licensing examinations actually measure clinical competence.” In comparison: the U.S. Medical Licensing Examination and the Comprehensive Osteopathic Medical Licensing Examination each specifically assess whether the examinee can apply medical knowledge and understanding of biomedical and clinical science essential for the unsupervised practice of medicine.

2. A 2004 sunrise report from the State of Florida concluded that there is “potential risk from licensing naturopathic physicians to allow them to provide a broad range of primary care services.” In 2006, a Missouri Senate committee report questioned the education and standardized testing of naturopaths, noting that the main naturopathic accrediting body has fallen “in and out of favor with the U.S. Department of Education.”

**There is no consistent application of evidenced-based principles and scientific study for naturopathic treatments:**

1. Some naturopathic-recommended treatments, such as using St. John’s wort for HIV-positive individuals, has been found by the National Institutes of Health to interact with protease inhibitors and significantly decrease their concentration in the blood.

2. The claim that a treatment has been used “for hundreds of years,” is not a substitute for randomized clinical trials and other rigorous scientific inquiry.

3. **In several studies funded by the National Center for Complimentary and Alternative Medicine, the efficacy of naturopathic treatments is not supported by clinical evidence. (For example: Ginkgo extract was found to produce no reduction in progression to dementia compared to a placebo; and shark cartilage supplement does not extend lives of lung cancer patients.)**

Naturopathy may have been in existence for more than 100 years, but modern accreditation standards as well as education and training standards show several shortcomings:

1. **No entrance exam**, such as the Medical College Admissions Test is required of applicants to schools of naturopathy. Compared to medical school and residency training, naturopathy has relatively few contact hours of study on pharmacological treatment of disease and little clinical reinforcement of pharmaceutical intervention on patients during clinical rotations or optional post-graduate training.

2. Graduates of four-year naturopathic programs take a standard examination that only measures their competency compared to other naturopathic practitioners – **without regard to any equivalency with medical board licensing.**

3. Clinical education for naturopaths typically begins in the third year of study, and graduates only are required to complete **720 hours of direct patient care over two years. In comparison, that is roughly two months of study of a first-year resident for a graduate of an accredited U.S. medical or osteopathic school of medicine.**

**The HMA would like to suggest that a panel of medically trained individuals (MD's, DO's, APRN's, and Pharmacists) be put together to determine prescriptive authority issues. We have collaborated with JABSOM on this idea and they would also be happy to help facilitate such a decision making body.**

People in Hawaii deserve better protection than this. This bill has major public health and safety implications. Thank you for the opportunity to provide this testimony.

Thank you for the opportunity to provide testimony

**From:** [mailinglist@capitol.hawaii.gov](mailto:mailinglist@capitol.hawaii.gov)  
**To:** [PSMTestimony](#)  
**Cc:** [david@kingdonconsulting.com](mailto:david@kingdonconsulting.com)  
**Subject:** Submitted testimony for SB2332 on Feb 11, 2016 13:15PM  
**Date:** Monday, February 08, 2016 3:18:40 PM

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**SB2332**

Submitted on: 2/8/2016

Testimony for PSM on Feb 11, 2016 13:15PM in Conference Room CR229

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
David Kingdon, MPH, Paramedic	Individual	Oppose	No

Comments: I have (2) concerns about this legislation that lead to my opposition. First: there is already public confusion about the education and scope of practice of "naturopathic" physicians. Only Medical Doctors (MD) and Doctors of Osteopathic medicine (DO) have the requisite education to truly serve as primary care and specialist physicians. Although alternative care providers certainly have a role in holistic and integrated healthcare, there should be a clear differentiation between those naturopathic providers versus MD or DO physicians. Unfortunately, this proposed legislation appears to blur those lines further. Secondly, Hawaii needs tighter availability and accountability surrounding prescription of controlled substances, not wider and looser prescribing credentials. This proposed legislation would widen a net that should instead be drawn in. Thank you for your consideration.

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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Michael Traub, ND  
LOKAMI HEALTH CENTER  
75-165 Hualalai Rd. Suite 301  
Kailua Kona, Hawaii 96740  
Phone 808-329-2114  
Fax 808-326-2871  
mtraubnd@me.com

Testimony in support of SB2332

February 8, 2016

To: Committee on Public Safety, Intergovernmental, and Military Affairs

Dear Senator Clarence Nishihara, Chair, Senator Will Espero, Vice Chair, and Committee members:

As stated in the preamble of this bill, testosterone is an example of a controlled substance that is consistent with the practice of naturopathic medicine, and naturopathic physicians are known for their expertise in bio-identical hormone replacement therapy. It is incongruous that naturopathic physicians cannot prescribe testosterone when medically necessary, simply because it is classified as a controlled substance.

Testosterone is the only controlled substance that the Board of Naturopathic Medicine would consider adding to the naturopathic formulary at this time.

Naturopathic physicians are acutely aware of the widespread abuse and overuse of narcotic pain medicines and do not seek authority to prescribe these substances.

The overwhelming majority of naturopathic physicians licensed in Hawaii have trained in naturopathic medical schools in Oregon, Washington, and Arizona where controlled substances are within the prescriptive authority of naturopathic physicians, and students receive sufficient classroom education and clinical training for their safe and appropriate use.

Thank you for your support of this measure.

Sincerely,

Michael Traub ND



Laurie Steelsmith ND, LAc  
438 Hobron Lane, Ste 314  
Honolulu, HI 96815  
Phone 808—943-0330  
Fax 808-943-0334  
[www.DrSteelsmith.com](http://www.DrSteelsmith.com)

**Testimony in support of SB2332**

February 9, 2016

To: Committee on Public Safety, Intergovernmental, and Military Affairs

Dear Senator Clarence Nishihara, Chair, Senator Will Espero, Vice Chair, and Committee members:

Please support SB2332 allowing naturopathic doctors to prescribe the hormone testosterone to patients according to their training and expertise. I have held a license to practice naturopathic medicine for 22 years in Hawaii, and also for most of that time in Washington State, where naturopathic physicians have been prescribing testosterone for many years. A few years ago, I took the necessary courses and training to obtain my DEA number in Washington State in order to prescribe testosterone, but did not renew my DEA number since I decided not to practice there. I am eager to be able to provide to my patients the full scope of my training, which includes extensive knowledge in methods of prescribing and monitoring patients taking testosterone.

Testosterone is the only controlled substance that the Board of Naturopathic Medicine would consider adding to the naturopathic formulary at this time.

The overwhelming majority of naturopathic physicians licensed in Hawaii have trained in naturopathic medical schools in Oregon, Washington, and Arizona, where controlled substances are within the prescriptive authority of naturopathic physicians, and students receive sufficient classroom education and clinical training for their safe and appropriate use.

Thank you for your support of this measure.

Sincerely,

Laurie Steelsmith ND, LAc

February 10th, 2016

The Honorable Chair Nishihara, Vice Chair Espero and members of the Public Safety, Intergovernmental and Military Affairs House Committee

Re: SB2332 – in support

My name is Landon Oponui, ND and I am a naturopathic physician in private practice in Honolulu for the past 2 years. Testosterone is an example of a controlled substance that is consistent with the practice of naturopathic medicine. As a naturopathic physician, I am very skilled at the assessment of hormones and the use of bio-identical hormone replacement therapy to correct hormonal imbalances. This treatment can be a very effective strategy for disease prevention, management of disease, and promotion of wellness. The role that I play as a primary care physician is often compromised because of my inability to responsibly prescribe testosterone when medically necessary for my patients, simply because it is classified as a controlled substance and falls outside of my current prescriptive authority.

My naturopathic medical training was at Bastyr University in Seattle, Washington where several controlled substances are within the prescriptive authority of naturopathic physicians. As a medical student I received classroom education and clinical training for their safe and appropriate use. On my clinical rotations I have trained with various provider types (MDs, DOs, NDs, PAs) who safely and effectively used bio-identical hormone replacement therapy with impressive clinical outcomes. I hope for the opportunity to support my patients who could benefit from my ability to prescribe testosterone for them when medically necessary.

For these reasons, I support SB2332

Mahalo,  
Landon Oponui, ND



## **Steelsmith Natural Health Center**

**438 Hobron Lane, Suite 314, Honolulu, Hawaii 96815**

**[www.SteelsmithHealth.com](http://www.SteelsmithHealth.com)**

**(808)943-0330**

Testimony in support of SB2332

To: Committee on Public Safety, Intergovernmental, and Military Affairs

Dear Senator Clarence Nishihara, Chair, Senator Will Espero, Vice Chair, and Committee ,

I am a Naturopathic Physician (ND) currently practicing in Honolulu. As a licensed ND I have an expertise in bio-identical hormone replacement therapy and use these treatments on a daily basis to improve the health of my patients. I support SB 2332 and the inclusion of testosterone to the naturopathic formulary. It is unreasonable that naturopathic physicians cannot prescribe testosterone when medically necessary, simply because it is classified as a controlled substance.

The overwhelming majority of naturopathic physicians licensed in Hawaii (including myself) have trained in naturopathic medical schools in Oregon, Washington, and Arizona where controlled substances are within the prescriptive authority of naturopathic physicians, and students receive sufficient classroom education and clinical training for their safe and appropriate use.

Testosterone is the only controlled substance we are currently asking the Board to include in our formulary at this time.

Thank you for your support of this measure.

Dr. Kristen Coles  
Naturopathic Physician, Licensed Acupuncturist  
Steelsmith Natural Health Center