



HAWAII MEDICAL ASSOCIATION

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TO:
COMMITTEE ON JUDICIARY
Senator Brian T. Taniguchi, Chair
Senator Karl Rhoads, Vice Chair

DATE: Tuesday, February 27, 2018
TIME: 9:30 a.m.
PLACE: Conference Room 016

FROM: Hawaii Medical Association
Dr. Christopher Flanders, DO, Executive Director
Lauren Zirbel, Community and Government Relations

Re: SB 2299– RELATING TO NATUROPATHIC MEDICINE

Position: OPPOSE

Chairs & Committee Members:

The Hawaii Medical Association (HMA) opposes SB 2299.

The HMA believes scheduled drugs should be used judiciously, and only for therapeutic applications demonstrating evidence based, peer reviewed value and safety to patients.

The HMA feels that the use of testosterone, at this time, has not been adequately established for applications related to “anti-aging.” The Journal of the American Medical Association has published recent studies in which the therapeutic use of testosterone has demonstrated no significant effect on improving intellectual function in the elderly.

The Endocrine Society has issued guidelines which outline the therapeutic use of testosterone only in instances of “consistent symptoms and signs and unequivocally low serum testosterone levels.” A significant amount of evaluation and testing, including serial blood serum testosterone levels, prostate evaluation, blood counts and urinary tract assessment should be conducted prior to instituting testosterone therapy.

Additionally, the use of testosterone is not without significant side effects, including increased incidence of potentially life threatening blood clots, acceleration of prostate cancer growth and development of sleep apnea.

HMA OFFICERS

President – William Wong, Jr., MD President-Elect – Jerry Van Meter, MD Secretary – Thomas Kosasa, MD
Immediate Past President – Bernard Robinson, MD Treasurer – Elizabeth A. Ignacio, MD
Executive Director – Christopher Flanders, DO



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Until the role of testosterone as a therapeutic agent is fully understood, its use should be limited to those specifically trained in the use of hormonal therapy, such as endocrinologists.

Thank you for allowing testimony on this issue.

HMA OFFICERS

President – William Wong, Jr., MD President-Elect – Jerry Van Meter, MD Secretary – Thomas Kosasa, MD
Immediate Past President – Bernard Robinson, MD Treasurer – Elizabeth A. Ignacio, MD
Executive Director – Christopher Flanders, DO



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February 27, 2018

The Honorable Brian T. Taniguchi, Chair
The Honorable Karl Rhoads, Vice Chair
Senate Committee on Judiciary

Re: SB 2299, SD1 – Relating to Naturopathic Medicine

Dear Chair Taniguchi, Vice Chair Rhoads, and Committee Members:

The Hawaii Medical Service Association (HMSA) appreciates the opportunity to testify on SB 2299, SD1, which authorizes a naturopathic physician to prescribe and administer testosterone that is consistent with naturopathic medical practice and clarifies that narcotic drugs and controlled substances, other than testosterone, shall not be included within the naturopathic formulary. HMSA supports the intent of this Bill, to align a naturopathic physician's prescriptive authority with the practice of naturopathic medicine.

Thank you for allowing us to testify on SB 2299, SD1.

Sincerely,

Pono Chong
Vice-President, Government Relations

SB-2299-SD-1

Submitted on: 2/24/2018 1:25:11 PM

Testimony for JDC on 2/27/2018 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Kevin Davison	Testifying for Maui Regenerative Medicine	Support	No

Comments:

I am in support of Senate Bill 223. I practice medicine on Maui and am in support of Naturopathic Physicians offering many important services for our community. We are very knowledgeable on the efficacious use of Bioidentical Hormone Replacement Therapy (BHRT) and should have full access to the preparations that include Testosterone.

Sincerely,

DrKevin Davison ND LAc

February 25, 2018

To the Senate Committee on Judiciary and the Honorable Senator Brian T. Taniguchi, Chair and the Honorable Senator Karl Rhoads, Vice Chair and members of the committee:

My name is David Kern. I am a naturopathic physician and president of the Hawaii Society of Naturopathic Physicians.

I am writing in support of SB 2299, SD1 Relating to Naturopathic Medicine and the prescriptive authority of natural testosterone.

Naturopathic Physicians have honorably served the people of Hawaii since 1925. To the present time, naturopathic physicians (NDs) have expanded their expertise in the safe and effective use of natural and scientific medicine. That medicine has included the use of the biologically identical hormones of estrogen, progesterone and thyroid. In 2010 the prescriptive authority of NDs was expanded. To date there have been no complaints brought before the Board of Naturopathic Medicine as a result of the expanded prescriptive rights or in the case of parental therapy.

As well trained doctors in the area of natural hormone therapy, NDs are skilled in the assessment and the safe and effective use of testosterone and should be able to have authority to prescribe it to their patients.

Respectfully submitted,

David Kern, ND, LAc
President Hawaii Society of Naturopathic Physicians

Grace Health Centers of Maui
Upcountry Makawao
South Maui Kihei

SB-2299-SD-1

Submitted on: 2/24/2018 2:03:01 PM

Testimony for JDC on 2/27/2018 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
steven Dubey	Testifying for Hawaii Society of Naturopathic	Support	No

Comments:

DEAR HONORABLE COMMITTEE CHAIRS, CO-CHAIRS AND

MEMBERS:

My name is Dr Steve Dubey , Naturopathic Physician and Licensed Acupuncturist, practicing on Kauai for the last 37 years. I am the Vice President of the Hawaii Society of Naturopathic Physicians. Our group is IN FAVOR OF PASSAGE OF SB2299 SD1.

Modern Naturopathic Physicians are primary Care Providers. Besides passing rigorous Board Examinations for licensing, we are required to satisfy Continuing Education Requirements of 35 total hours Biennially, with 15 of them in Pharmacy.

The Naturopathic Formulary , established in 2010 by our Board, does include many prescription medicines of natural origin such as hormones.

Thus Naturopathic physicians in Hawaii , and well as other states (such as

Oregon and Washington, Arizona for example) , have the ability to prescribe the majority of medicines commonly prescribed in family practice.

We have excellent rapport and support from Pharmacists and our MD colleagues, and overwhelming support from our patients who appreciate the complementary approach of balancing natural therapies and remedies with more conventional medicines.

As primary care practitioners, we use standard Physical Examination, Laboratory and Radiological assessments, as well as special studies to make a diagnosis. To diagnose a patient deficient in Testosterone and not be able to prescribe that medicine for them is incongruous with our practice and philosophy.

I conclude :

Testosterone is listed in the World Health Organization's "Model List of Essential Medicines" , 19th edition , published in April of 2015, and should be included in the Naturopathic Formulary.

Thank you

Steve Dubey ND LAc

3093 Akahi St

Lihue , Hi 96766

www.nhckauai.com

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 SB2299SD1

February 24, 2018

Dear Senator Taniguchi, Chair, Senator Rhoads, Vice-Chair, and members of the Committee on Judiciary:

I am Michael Traub, ND, Past-president of the American Association of Naturopathic Physicians, current Secretary of the Hawaii Society of Naturopathic Physicians. I have practiced in Hawaii for the past 33 years.

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 classified as a controlled substance due to its supposed potential for abuse and physical or psychological dependence. Testosterone is implicated for its potential for abuse due to its similarity to anabolic steroids such as DepoTestosterone. In reality, individuals, such as body builders, who abuse anabolic steroids use other drugs, in much high doses (not testosterone) for increasing strength and muscle mass. Testosterone is actually a hormone that has accepted medical use for men and women who have laboratory proven deficiency and clinical symptoms that warrant its use. The doses used in testosterone replacement only achieve physiologic (normal) levels of hormone in the blood.

Testosterone deficiency in both males and females increases risk for obesity, type 2 diabetes, metabolic syndrome, cardiovascular disease, dyslipidemia (abnormal blood cholesterol and fats), inflammation, hypertension, loss of lean body mass, muscle volume and strength, and bone mineral density.

Naturopathic physicians have a clean record regarding prescriptive authority. There have been no disciplinary actions taken by the Board of Naturopathic Medicine, nor any malpractice awards against a naturopathic physician regarding harm or abuse from the prescription of any drug included on the naturopathic formulary.

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.

The companion bill to SB2299, HB1949, was heard in the House Committee on Health & Human Services on January 25, 2018. Hawaii Medical Association testified in opposition, and HMSA provided comments, that led to a Committee report that suggested that “the use of testosterone may not have sufficient evidence to justify applications related to anti-aging,” and “the usage of testosterone causes potentially harmful side effects,” and asked that the Board of Naturopathic Medicine address these concerns in further testimony on this measure.

Unfortunately, the Board of Naturopathic Medicine is unable to address these concerns due to a lack of sufficient Board members at this time.

However, I have served on the Board of Naturopathic Medicine in the past for 16 years, much of that time as Chair. As such, I believe I can address these concerns to your satisfaction.

First of all, I believe the opposition by HMA is disparaging and distracting. In the 7 or 8 years that this measure has been introduced in the legislature, nowhere will you find “anti-aging” as a suggested application in testimony in support for the prescription of testosterone by naturopathic physicians. On the contrary, a huge amount of evidence in the published medical literature supports the use of testosterone when medically necessary. Medical necessity is defined by insurance companies (such as Noridian) in these terms:

Low serum testosterone alone does not constitute a diagnosis of androgen deficiency or clinical hypogonadism. Diagnosis of a clinical condition requires the presence of certain characteristic symptoms as well as an abnormally low serum testosterone. Many of the symptoms are not specific to, and not directly correlated to specific levels of testosterone. Guidelines from the Endocrine Society suggest some of the following symptoms may be related to low serum testosterone but may also have many other causes in the elderly population.

More Specific Signs / Symptoms

- Incomplete or delayed sexual development
- Reduced sexual desire (libido) and activity
- Breast discomfort, gynecomastia (enlarged breasts)
- Loss of body (axillary and pubic) hair, reduced shaving
- Very small or shrinking testes
- Inability to father children
- Low-trauma fracture, low bone mineral density (osteoporosis)
- Hot flushes, sweats

Less Specific Signs/Symptoms

- Decreased energy, motivation, initiative and self confidence
- Feeling sad or blue, depressed mood, dysthymia
- Poor concentration and memory
- Sleep disturbance, increased sleepiness
- Mild anemia

- Reduced muscle bulk and strength
- Increased fat or increased body mass index
- Diminished physical or work performance
- Zero sperm count

Evaluation of primary hypogonadism is undertaken with at least 2 separate serum testosterone levels taken on two different days in the morning (when testosterone secretion is highest), and/or two morning levels of “free” or bioavailable testosterone) and Luteinizing Hormone (LH) and Follicle Stimulating Hormone (FSH) levels. Elevated LH/FSH confirms primary hypogonadism and the potential need for replacement hormone. If the two testosterone determinations are low AND the LH/FSH levels are also low, pituitary disease (including a serum prolactin) or chronic diseases must be considered.

Patients with low testosterone associated significant symptoms should be considered for treatment. A comprehensive examination is required to evaluate for medications or chronic diseases known to cause decreased energy, memory problems, impotence and mental health problems.

HMSA’s testimony raising concerns about safety is puzzling, as it flies in the face of their decision last year to credential naturopathic physicians as participating primary care providers. It does not make sense that they would question the ability of naturopathic physicians in their network to know how to safely prescribe testosterone. The main concerns with safety involve adverse effects when testosterone is prescribed in excessive doses, or in men who have prostate cancer. Concerns about increased risks of heart attack, stroke and blood clots have not been confirmed in large clinical trials.

Finally, it must be recognized that naturopathic physicians have a higher level of education and training than physician’s assistants and advanced practice registered nurses, both of whom have authority to prescribe testosterone.

In summary, the request for adding testosterone to the Naturopathic Formulary is based on conventional guidelines for its medical necessity. Naturopathic physicians have distinguished themselves for their safe prescribing practices. There is no valid reason, and no evidence whatsoever, to exclude this medication from the Naturopathic Formulary.

Thank you for your support of this measure.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Traub", with a long horizontal flourish extending to the right.

Michael Traub ND

**PRESENTATION OF THE
BOARD OF NATUROPATHIC MEDICINE**

TO THE SENATE COMMITTEE ON JUDICIARY

TWENTY-NINTH LEGISLATURE
Regular Session of 2018

Tuesday, February 27, 2018
9:30 a.m.

WRITTEN TESTIMONY ONLY

**TESTIMONY ON SENATE BILL NO. 2299, S.D. 1, RELATING TO NATUROPATHIC
MEDICINE.**

TO THE HONORABLE BRIAN T. TANIGUCHI, CHAIR, AND MEMBERS OF THE
COMMITTEE:

My name is Constance Cabral, and I am the Executive Officer of the Board of Naturopathic Medicine ("Board"). Thank you for the opportunity to present written testimony on this measure, which is a companion to H.B. 1949. While the Board has not had the opportunity to review the Senate measure, the Board would strongly support it, as it is identical to last year's S.B. 223, S.D.2, H.D.1, which it strongly supported.

S.B. 2299, S.D. 1 authorizes a naturopathic physician to prescribe and administer testosterone that is consistent with naturopathic medical practice. It clarifies that narcotic drugs shall not be included within the naturopathic formulary.

The Board takes its duties and responsibilities to the people of Hawaii very seriously. Since 1925, licensed naturopathic physicians have been practicing competently. They have solid naturopathic medical education and clinical training, as well as clinical experience with natural hormone therapy. In treating patients with natural hormones, naturopathic physicians do so with safety, appropriate prescribing, and efficacy in mind. As a result, the Board has taken no disciplinary matters since hormones were included in the naturopathic formulary.

Thank you for the opportunity to provide written testimony on S.B. 2299, S.D. 1.

SB-2299-SD-1

Submitted on: 2/25/2018 11:32:38 AM

Testimony for JDC on 2/27/2018 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Dr. Kevin R. Gibson	Individual	Support	No

Comments:

The inclusion of testosterone into the naturopathic physicians formulary will complement our current prescriptive authority of hormones and allow us to more fully practice as primary care physicians. This ability helps the patient and reduces healthcare costs.

Many other states with naturopathic licensing statutes include testosterone in their formulary and students are taught to prescribe safely.

Mahalo for your support.

Kevin Gibson ND, LAc, MS; Dist 13

Dr. Nathan Ehrlich, N.D.

Licensed Naturopathic Physician
PO Box 756 • Makawao, HI 96768
808.572.1388 • fax 808.572.1389
email: nat@maui.net

February 24, 2017

Hawaii State Legislative Session 2018

RE: testimony for SB2299 SD1
Tues, February 27, 2018 at 9:30 am at the State Capital Building,
415 South Beretania Street.

Dear honorable committee chairs, co-chairs and members,

My name is Dr. Nathan Ehrlich, N.D. I am a naturopathic physician practicing in Hawaii on the island of Maui since 1989. I am submitting my testimony to urge you to support SB2299 SD1 which would grant prescriptive authority to Naturopathic Physicians in the state of Hawaii for Testosterone. 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. Naturopathic physicians have a track record of safety and of being the leaders in the field of bio-identical hormone therapy and though we have been prescribing estrogen and progesterone in this state, we are limited in providing complete hormonal protocols on men and women patients when testosterone production is insufficient. Testosterone is safe to prescribe by trained physicians and we as Naturopathic physicians are trained to implement this form of therapy with our patients.

Testosterone is classified as a controlled substance and is the only substance in this category that would be added to our formulary. Including Testosterone in the Hawaii Naturopathic Physician Formulary allows me to better serve the needs of my patients.

Thank you for hearing my testimony and for your support of this measure.

Sincerely,

Dr. Nathan Ehrlich, N.D.

SB-2299-SD-1

Submitted on: 2/24/2018 1:38:06 PM

Testimony for JDC on 2/27/2018 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Carrie Brennan, N.D.	Individual	Support	No

Comments:

I am in support of this bill. Thank you!

SB-2299-SD-1

Submitted on: 2/24/2018 1:37:17 PM

Testimony for JDC on 2/27/2018 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Miles Greenberg	Individual	Support	No

Comments:

Dear Honorable Senate Chair Taniguchi, Vice Chair Rhoads and other Members on the Judiciary Committee,

Please SUPPORT SB2299 SD1 for the authorization for naturopathic physicians to prescribe testosterone as it is consistent with the practice of naturopathic medicine to prescribe natural or equivalent compounds like hormone replacement therapies (HRT) to promote health. Other HRT's have been utilized by ND's who monitor biological values for appropriate indication and evaluation without a reported incident of harm to the public in the State of Hawaii

Testosterone would complement our repertoire of restorative HRT's since it has been omitted from our formulary due to its listing as a controlled substance. All other controlled substances would be precluded from the naturopathic formulary.

Thank you for your consideration and SUPPORT of this bill.

Miles Greenberg, ND
3093 Akahi St.
Lihue, HI 96766

SB-2299-SD-1

Submitted on: 2/24/2018 2:38:59 PM

Testimony for JDC on 2/27/2018 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Lawrence E. Woodhouse, PharmD	Individual	Support	No

Comments:

My name is Lawrence E. Woodhouse, Pharm.D. and I am a licensed pharmacist in Hawaii (7 years) and California (39years). I have been associated with Naturopathic Physicians since 2001 in my capacity as licensed pharmacist and Director of Business Development at a large compounding pharmacy located in California.

I support the addition of Testosterone to the Hawaii Naturopathic Physicians formulary due to their didactic training in medical school and post doctorage as true experts in hormone replavement therapy. My personal experience with Naturopathic Physicians from Washington, Roegon, California and Arizona has proved to suppor the judicious use and application of hormone replacement therapy. Specifically, Naturopathic Physicians in Hawaii have been handicaped the only the ability of use hormones currently on their formulary and without the ability to fully balance the hormone profile with testosterone as a sole practitioner. Please consider the safety profile of all Naturopathic Physicians using testosterone in addition to estrogen, progesterone in all the states where this prescriptive authority has been authorized as affirmation of their ability to appropriately manage, perscribe and regulate complicated horme replacement therapies.

Thank you for considering a pharmacist point of view with significant history working with Naturopathis Physicnans in all areas of therapeutic application.

Karen Tan, ND, MAcOM, LAc.
Center for Innovative Medicine, LLC
320 Ward Ave, Suite 105
Honolulu, HI 96814
(808) 591-8778

Testimony in support of SB 2299 SD1

Dear Senator Taniguchi & Senator Rhoads & the Judiciary Committee

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 deficiency in both males and females increases risk for obesity, type 2 diabetes, metabolic syndrome, cardiovascular disease, dyslipidemia (abnormal blood cholesterol and fats), inflammation, endothelial dysfunction, hypertension, loss of lean body mass, muscle volume and strength, and bone mineral density.

Naturopathic physicians have a clean record regarding prescriptive authority. There have been no disciplinary actions taken by the Board of Naturopathic Medicine, nor any malpractice awards against a naturopathic physician regarding harm from the prescription of any drug included on the naturopathic formulary.

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,

Karen Tan, ND, MAcOM, LAc.

SB-2299-SD-1

Submitted on: 2/26/2018 8:52:45 AM

Testimony for JDC on 2/27/2018 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Jack Burke	Individual	Support	No

Comments:

I am strongly in favor of this bill, as the prescription of testosterone by naturopathic physicians may dramatically help the the health of many citizens of the State of Hawaii, and because it is consistent with the training of naturopathic physicians.

SB-2299-SD-1

Submitted on: 2/26/2018 9:50:57 PM

Testimony for JDC on 2/27/2018 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Rachel L. Kailianu	Individual	Support	Yes

Comments:

In STRONG SUPPORT.