

STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. Box 3378
Honolulu, HI 96801-3378
doh.testimony@doh.hawaii.gov

**Testimony COMMENTING on HB516
RELATING TO HEALTH**

REP. DELLA AU BELATTI, CHAIR
HOUSE COMMITTEE ON HEALTH & HOMELESSNESS

Hearing Date: 02-04-23

Room Number: 329

1 **Fiscal Implications:** None.

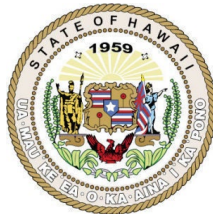
2 **Department Testimony:** The Department of Health (DOH) provides the following comments
3 on this measure which seeks to improve access to cannabis for medical use by expanding the
4 scope of professionals who may provide written certifications to qualifying patients for medical
5 use by amending various sections of part IX, chapter 329, Hawaii Revised Statutes.

6 There are approximately 4,744 physicians and Advance Practice Registered Nurses (APRNs)
7 practicing medicine in the state of Hawaii. Of these, only 8.1% or 386 physicians and APRNs
8 actively certify patients for medical use. There are approximately 352 licensed naturopathic
9 physicians in Hawaii. Naturopathic physicians are trained in botanical medicines and their
10 interactions with pharmaceutical medications. Authorizing naturopathic physicians to certify
11 patients will increase the pool of professionals who may provide written certifications which
12 could increase utilization of the medical cannabis program.

13 Thank you for the opportunity to testify.

14 **Offered Amendments:** None.

JOSH GREEN
GOVERNOR



JORDAN LOWE
DIRECTOR

MICHAEL S. VINCENT
Deputy Director
Administration

STATE OF HAWAII | KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF LAW ENFORCEMENT
Ka 'Oihana Ho'opalekana Lehulehu
1177 Alakea Street
Honolulu, Hawaii 96813
(808) 587-2562

Vacant
Deputy Director
Law Enforcement

No.

TESTIMONY ON HOUSE BILL 516

RELATING TO HEALTH

Before the House Committee on Health and Homelessness

Saturday, February 4, 2023; 9:30 a.m.

State Capitol Conference Room 329, Via Videoconference

WRITTEN TESTIMONY ONLY

Chair Belatti, Vice Chair Takenouchi, and Members of the Committee:

The Department of Law Enforcement (DLE) **offers comments** on House Bill (HB) 516 , which seeks to: 1) authorize naturopathic physicians to provide written certification to qualifying patients for the medical use of cannabis and 2) clarify provisions regarding the establishment of bona fide physician-patient, naturopathic physician-patient, and advanced practice registered nurse-patient relationships via telehealth. DLE, however, does not support HB 516 in one important area.

Traditionally, DLE does not support or oppose efforts to determine the question of which class of healthcare professional should, or should not, have the authority to work with controlled substances in Hawaii. Instead, DLE leaves such policy questions for the Legislature to determine.

However, DLE does not support this proposal in one very important area. DLE opposes the changes in HB 516 that removes the controlled substances registration requirements for physicians and advanced practice registered nurses who participate in Hawaii's Medical Use Of Cannabis Program. Since the beginning of Hawaii's Medical Use of Cannabis Program, state law has always required the participants who participate in the program to obtain a "registration". For example, practitioners, laboratories, dispensary retail centers, and dispensary cultivation facilities must all be

registered. More specifically, every class of healthcare professional (e.g., physicians and nurses) who make a “recommendation” for a patient to use medical cannabis has always been required to obtain a Hawaii controlled substances registration under section 329-32, Hawaii Revised Statutes (HRS). As a result, every participant in the program has had to obtain a controlled substances registration before participating and making recommendations for patients to use medical cannabis.

“Registration” is the primary way that practitioners are regulated in our system of laws. By registering, practitioners are required to keep records, engage in professional activities, and are prohibited from engaging in fraud, diversion and other criminal acts. DLE believes that as a result of registration, there have been few, if any, acts of misconduct amongst the medical cannabis practitioner community. As HB 516 seeks to remove such an important mechanism by changing existing definitions of physician and advanced practice registered nurse, DLE opposes that part of HB 516. .

This said, if it is the legislature’s intent to allow a naturopathic physician to participate in Hawaii’s Medical Cannabis Program, then DLE recommends that the definition of a “naturopathic physician” **include** the requirement to obtain a registration under section 329-32, HRS, consistent with the traditional and essential requirement for registration imposed by the legislature currently upon (allopathic) physicians and advanced practice registered nurses.

DLE would also clarify that we understand that there has been, and continues to be, discussions over the potential authority for naturopathic physicians to work with controlled substances. If the legislature would like to allow naturopathic physicians to give recommendations for the medical use of cannabis **it could certainly do so** and still require naturopathic physicians to obtain a registration for limited use in the medical cannabis program. To enact such a limit, DLE recommends that the legislature define a naturopathic physician as:

“Naturopathic physician” means a person who holds a current license to practice naturopathic medicine under chapter 455 and registered under section 329-32, provided

DLE Testimony on HOUSE BILL 516
RELATING TO HEALTH .
February 2, 2023
Page 3

such registration is restricted to participation in the Medical Use of Cannabis Program,
as provided in Part IX of chapter 329, HRS.

Thank you for the opportunity to testify on this measure.

Testimony of the Board of Naturopathic Medicine

**Before the
House Committee on Health and Homelessness
Saturday, February 4, 2023
9:30 a.m.
Conference Room 329 and Videoconference**

**On the following measure:
H.B. 516, RELATING TO HEALTH**

Chair Belatti and Members of the Committee:

My name is Christopher Fernandez, and I am the Executive Officer of the Board of Naturopathic Medicine (Board). The Board's Legislative Committee (Committee) appreciates the intent of and offers comments on this bill.

The purposes of this bill are to: (1) authorize naturopathic physicians to provide written certification to qualifying patients for the medical use of cannabis; and (2) clarifies provisions regarding the establishment of bona fide physician-patient, naturopathic physician-patient, and advanced practice registered nurse-patient relationships via telehealth.

The Committee notes:

- (1) In 2020, the Board supported a similar bill, H.B. 1797, H.D. 1, opining that, "...certifying patients for the use of medical cannabis falls within the scope of practice, education, and training of a naturopathic physician"; and
- (2) Since the definition of "physician" in Hawaii Revised Statutes (HRS) chapter 329-121 currently excludes Naturopathic Physicians, "Naturopathic Physician" would need to be added to "Practitioner" as defined in HRS section 329-1, to adhere to the requirements of HRS section 455-(8)(a), which requires:

Naturopathic physicians licensed under this chapter shall observe and be subject to all state requirements relative to reporting births and all matters pertaining to the public health with equal rights and obligations as physicians, surgeons, and practitioners of other schools of medicine. These equal rights shall apply to all matters of

public health, including the performance of medical examinations and evaluations.

Lastly, the Board will meet on Friday, February 3, at which time it will discuss and be able to offer comments on the telehealth portion of this bill as it pertains to Naturopathic Physicians. For now, the Committee notes that chapter 455 may need to be amended to reflect existing telehealth language in HRS chapter 329 and HRS chapter 453.

Thank you for the opportunity to testify on this bill.



**Testimony Presented Before the
House Committee on Health & Homelessness
Saturday, February 4, 2023 at 9:30 A.M.
Via Videoconference and Conference Room 329**

**By
Laura Reichhardt, APRN, AGPCNP-BC
Hawai'i State Center for Nursing
University of Hawai'i at Mānoa**

Comments on H.B. 516

Chair Belatti, Vice Chair Takenouchi, and Members of the House Committee on Health & Homelessness, thank you for the opportunity for the Hawai'i State Center for Nursing to provide comments on this measure. This measure, in part, clarifies provisions regarding the establishment of bona fide physician-patient, naturopathic physician-patient, and advanced practice registered nurse-patient relationships via telehealth.

With the legislature's vision of accessible, safe, and quality health care, it has enabled Advanced Practice Registered Nurses to work to the top of their education and training. As such, APRNs with prescriptive authority are authorized to assess and diagnose health care conditions and prescribe medications to patients. In addition, APRNs are authorized to engage in recommending medical marijuana and engage in patient care through telehealth.

The statutory amendments as they are proposed in H.B. 516 appear to add clarity to the laws. The Hawai'i State Center for Nursing thanks you for your consideration on this topic. Thank you for the dedication and care for the people of Hawai'i and access to healthcare.

The mission of the Hawai'i State Center for Nursing is that through collaborative partnerships, the Center provides accurate nursing workforce data for planning, disseminates nursing knowledge to support excellence in practice and leadership development, promotes a diverse workforce, and advocates for sound health policy to serve the changing health care needs of the people of Hawai'i.



Date: February 3, 2022

To: Representative Della Au Belatti, Chair
Representative Jenna Takenouchi, Vice Chair
Members of the House Health & Homelessness Committee

From: Hawai'i Society of Naturopathic Physicians

Re: HB516, Relating to Health
February 4, 2023, at 9:30am

Position: STRONGLY SUPPORT

The Hawai'i Society of Naturopathic Physicians supports this bill, which would add Naturopathic Physicians to the provider types who may certify patients for medical cannabis use. Medical cannabis is a helpful tool for patients with qualifying conditions, but there are often access issues due to a limited number of providers participating with the medical cannabis program.

Naturopathic Physicians serve as primary care physicians for many patients in the state, managing their prescription medications and other medical needs. Naturopathic Physicians have extensive training in the use of botanical medicines, including cannabis, and the possible interactions with pharmaceutical medications. Due to this specific training, Naturopathic Physicians are uniquely positioned to fill the need for certifying doctors participating with the Hawai'i Medical Cannabis Program.

By supporting this measure, you will be helping to increase access to healthcare for qualifying patients.

Thank you for your time and attention to this matter,

Baron Glassgow
Executive Director
Hawai'i Society of Naturopathic Physicians



Dedicated to safe, responsible, humane and effective drug policies since 1993

TESTIMONY SUPPORTING HB 516

TO: Chair Belatti, Vice-Chair Takenouchi, & Committee Members

FROM: Nikos Leverenz
DPFH Board President

DATE: February 4, 2023 (9:30 AM)

Drug Policy Forum of Hawai'i **strongly supports** HB 516, which includes naturopathic physicians and a broader category of APRNs to provide written certification for the medical use of cannabis.

Per the recommendation of the Medical Use Working Group of the [Department of Health's Dual Use Cannabis Task Force](#) last year, which I was honored to be a part of, **Section 329 can be strengthened by eliminating the "debilitating medical condition" requirement and instead be replaced with "any medical condition where the therapeutic use of cannabis may be of benefit."**

Regrettably, cannabis is still a Schedule I substance under federal Controlled Substances Act (CSA). As such, scientific research around cannabis has been needlessly inhibited.

In 2019, the Hawai'i Legislature called upon the U.S. Congress to remove cannabis from the CSA via HCR 89.

The therapeutic potentialities of cannabis for particular medical conditions is an area where there are myriad prospects future scientific discovery. Medical cannabis research could be an area where Hawai'i can foreseeably position itself as national or global leader once the federal government has taken cannabis out of the federal CSA.

Mahalo for the opportunity to provide testimony.



To: Representative Della Au Belatti, Chair
Representative Jenna Takenouchi, Vice Chair
Members of the House Committee on Health and Homelessness

Fr: Bill Jarvis, Chief Executive Officer of Noa Botanicals

Re: **Testimony In Support of House Bill (HB) 516**

RELATING TO MEDICAL CANNABIS.

Authorizes naturopathic physicians to provide written certification to qualifying patients for the medical use of cannabis. Clarifies provisions regarding the establishment of bona fide physician-patient, naturopathic physician-patient, and advanced practice registered nurse-patient relationships via telehealth.

Dear Chair, Vice-Chair and Members of the Committee:

Noa Botanicals is one of the three licensed medical cannabis dispensaries on Oahu and we **support HB516**.

Thank you for the opportunity to testify.

Best,

Bill Jarvis
CEO
Noa Botanicals

HB-516

Submitted on: 2/2/2023 3:37:53 PM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Tai Cheng	Aloha Green Holdings Inc.	Support	Written Testimony Only

Comments:

Aloha Green Apothecary supports the intent of HB516.

Esteemed Rep. Della Au Belatti, Chair
Rep. Jenna Takenouchi, Vice Chair
And Members of the House Committee on Health and Homelessness

Current Hawai'i law allows a state-licensed Medical Doctor, Doctor of Osteopathy, or Advanced Practice Registered Nurse (APRN) to certify a patient for the Medical Cannabis Program. HB516 would add Naturopathic Physicians to the allowed provider types.

HB516 is the result of a collaborative effort on the part of the Department of Health, Department of Public Safety, and the Hawaii Society of Naturopathic Physicians to essentially modify existing law pertaining to APRN's in this matter. In addition to the aforementioned state agencies, the cannabis dispensaries are also strongly supportive of the addition of naturopathic physicians to the eligible provider types.

In addition to their expertise in botanical medicine, naturopathic physicians are primary care providers and manage prescription medications and other concerns for many patients.

Adding naturopathic physicians to the provider types eligible to certify patients for the Hawai'i Medical Cannabis program would significantly increase access to healthcare and benefit the eligible patients in Hawai'i for whom medical cannabis may be a good therapeutic option.

Mahalo for all the work your committee does to improve the health of the people of Hawaii.

Sincerely,

Michael Traub ND, FABNO



KLEIN NATURAL

HEALTH AND WELLNESS CENTER

February 3, 2023

To: Representative Della Au Belatti, Chair
Representative Jenna Takenouchi, Vice Chair
Members of the Committee on Health & Homelessness

From: Dr. Rachel M. Klein

Re: HB516, Relating to Health
February 4, 2023, at 9:30am

Position: **STRONG SUPPORT**

As a Naturopathic Physician, I strongly support this measure, which would add Naturopathic Physicians to the provider types who may certify patients for medical cannabis use. Medical cannabis is a helpful tool for patients with qualifying conditions, however there are often access issues due to the limited number of providers participating with the medical cannabis program.

Naturopathic Physicians serve as primary care physicians for many patients in the state, managing their prescription medications and other medical needs. In addition to conventional medicine skills, Naturopathic Physicians have extensive training in the use of botanical medicines, including cannabis, and their interactions with pharmaceutical medications. Due to this specific training, Naturopathic Physicians are uniquely qualified to fill the need for certifying doctors participating with the Hawai'i Medical Cannabis Program.

By supporting this measure, you will be helping to increase access to healthcare for qualifying patients.

Mahalo for your time and consideration,

Rachel M. Klein, ND, DC, DACNB, FIBN-CNDH

HB-516

Submitted on: 2/3/2023 7:44:19 AM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Bonnie Masterjohn	Individual	Support	Written Testimony Only

Comments:

I support bill HB516

HB-516

Submitted on: 2/3/2023 7:50:48 AM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
megan.leucht@gmail.com	Individual	Support	Written Testimony Only

Comments:

Aloha Esteemed Committee Members,

As a patient of a Naturopathic physician I have seen first hand the benefits and efficacy of functional medicine. I find it suprising that they are not given the prescribing rights as any other medical doctor. I support this bill, because all though the service and care they provide is new to most people, that does not mean that they are any less of a medical professional and shouldn't be restricted in the care they can provide.

Mahalo for your attention to this matter,

Megan Leucht

HB-516

Submitted on: 2/3/2023 7:53:15 AM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Dr. John J. Kim	Individual	Support	Written Testimony Only

Comments:

Aloha Chair Belatti, Vice Chair Takenouchi and Committee Members,

I support HB516 and urge you to support it as well. I have been a patient and colleague of Naturopathic Physicians for many years and have seen first hand their expertise and well-rounded medical skills. I have confidence that Naturopathic Physicians would be responsible practitioners to provide this service to qualifying patients. Please support this measure and allow Naturopathic Physicians to certify patients for medical cannabis use.

Thank you,

John J. Kim, DC

HB-516

Submitted on: 2/3/2023 7:53:25 AM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Dr Sarah Strong, ND	Individual	Support	Written Testimony Only

Comments:

Please support HB516. NDs are qualified and can help reduce healthcare burdens in this state by being allowed to practice to the extent of their training.



Date: February 3, 2022

To: Representative Della Au Belatti, Chair
Representative Jenna Takenouchi, Vice Chair
Members of the House Health & Homelessness Committee

From: Robert E. Klein, D.C.

Re: HB516, Relating to Health
February 4, 2023, at 9:30am

Position: STRONGLY SUPPORT

Current Hawai'i law allows a state-licensed Medical Doctor, Doctor of Osteopathy, or Advanced Practice Registered Nurse (APRN) to certify a patient for the Medical Cannabis Program. HB516 would add Naturopathic Physicians to the allowed provider types. In addition to their expertise in botanical medicine, naturopathic physicians are primary care providers and manage prescription medications and other concerns for many patients.

As a health care professional serving in Hawaii for the past 43 years, I clearly see the need for such providers and strongly recommend the expertise of these licensed physicians.

Adding naturopathic physicians to the provider types eligible to certify patients for the Hawai'i Medical Cannabis program would significantly increase access to healthcare and benefit the eligible patients in Hawai'i for whom medical cannabis may be a good therapeutic option.

Mahalo for all the work your committee does to improve the health of the people of Hawaii.

Sincerely,

Robert E. Klein, D.C., F.A.C.O.

Testimony on HB516
Cheri Wood, ND IFMCP

February 3, 2023

To:

Representative Della Au Belatti, Chair
Representative Jenna Takenouchi, Vice Chair
Members of the House Committee on Health and Homelessness

From:

Cheri Wood, ND IFMCP

Re:

HB516, Relating to Health
February 4, 2023, at 9:30am

Position: STRONGLY SUPPORT

My name is Cheri Wood, and I am a licensed naturopathic physician in the State of Hawaii. I strongly support this measure, which would add Naturopathic Physicians to the provider types who may certify patients for medical cannabis use. Medical cannabis is a helpful tool for patients with qualifying conditions, but there are often access issues due to a limited number of providers participating with the medical cannabis program.

Naturopathic Physicians serve as primary care physicians for many patients in the state, managing their prescription medications and other medical needs. Naturopathic Physicians have extensive training in the use of botanical medicines, including cannabis, and the possible interactions with pharmaceutical medications. Due to this specific training, Naturopathic Physicians are uniquely positioned to fill the need for certifying doctors participating with the Hawai'i Medical Cannabis Program.

By supporting this measure, you will be helping to increase access to healthcare for qualifying patients.

Thank you for your time and consideration,

Dr. Cheri Wood



1188 Bishop St.
Unit 1605
Honolulu Hawaii 96813
808-524-8715
info@hawaiinaturalmedicine.com

Date: February 3, 2022

To: Representative Della Au Belatti, Chair
Representative Jenna Takenouchi, Vice Chair
Members of the House Health & Homelessness Committee

From: Dr. Stephen Benchouk

Re: HB516, Relating to Health
February 4, 2023, at 9:30am

Position: STRONGLY SUPPORT

As a Naturopathic Physician, I strongly support this measure, which would add Naturopathic Physicians to the provider types who may certify patients for medical cannabis use. Medical cannabis is a helpful tool for patients with qualifying conditions, but there are often access issues due to a limited number of providers participating with the medical cannabis program.

Naturopathic Physicians serve as primary care physicians for many patients in the state, managing their prescription medications and other medical needs. Naturopathic Physicians have extensive training in the use of botanical medicines, including cannabis, and the possible interactions with pharmaceutical medications. Due to this specific training, Naturopathic Physicians are uniquely positioned to fill the need for certifying doctors participating with the Hawai'i Medical Cannabis Program.

By supporting this measure, you will be helping to increase access to healthcare for qualifying patients.

Mahalo for your time and consideration,

Stephen Benchouk ND

HB-516

Submitted on: 2/3/2023 8:33:57 AM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Amy	Individual	Support	Written Testimony Only

Comments:

The changes requested in HB516 are for the benefit of the general public and consistent with current practices in other fields and in similar fields of other jurisdictions.

Cannabis is both an herbal medicinal and approved for prescription use. Naturopathic doctors specialize in herbal medicinals and should be granted the prescribing rights.

HB-516

Submitted on: 2/3/2023 8:36:50 AM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Erin McClure	Individual	Support	Written Testimony Only

Comments:

Aloha esteemed comittee members,

As a naturopathic patient, I have seen the level of understanding for how non-pharmaceutical options interact with our natural body systems, that NDs are taught. They have the grasp of how these things interact & should be allowed to expand their scope to cannabis. I am in support of this bill.

Mahalo,

Erin McClure

HB-516

Submitted on: 2/3/2023 9:51:05 AM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Dr. Sahib Singh	Uplifted Health	Support	Written Testimony Only

Comments:

As a licensed Naturopathic Physician, here in the state of Hawaii, I highly support this measure.

HB-516

Submitted on: 2/3/2023 12:15:50 PM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Dr. Amber Ellington	Individual	Support	Written Testimony Only

Comments:

I strongly support this measure.

HB-516

Submitted on: 2/1/2023 9:18:39 PM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Me	Individual	Oppose	Written Testimony Only

Comments:

Having a DEA license is currently required to recommend for cannabis 329 card. The law would have to be amended because DEA licenses are only granted to individuals with prescriptive authority.

HB-516

Submitted on: 2/3/2023 8:52:21 PM

Testimony for HLT on 2/4/2023 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
David Kern	Individual	Support	Written Testimony Only

Comments:

I support HB516. I encourage members of the House Committee on Health to do the same.

Mahalo!

JOSH GREEN, MD
GOVERNOR



TOMMY JOHNSON
DIRECTOR

Melanie Martin
Deputy Director
Administration

Michael Hoffman
Deputy Director
Corrections

William Oku, Jr.
Deputy Director
Law Enforcement

STATE OF HAWAII | KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF PUBLIC SAFETY
KA 'OIHANA HO'OPALEKANA LEHULEHU
1177 Alakea Street
Honolulu, Hawaii 96813

No. _____

TESTIMONY ON HOUSE BILL 516
RELATING TO HEALTH

By
Tommy Johnson, Director

House Committee on Health and Homelessness
Representative Della Au Belatti, Chair
Representative Jenna Takenouchi, Vice Chair

Saturday, February 4, 2023; 9:30 a.m.
Via Videoconference

Chair Belatti, Vice Chair Takenouchi, and Members of the Committee:

The Department of Public Safety (PSD) **offers comments** for House Bill (HB) 516 , which seeks to: 1) authorize naturopathic physicians to provide written certification to qualifying patients for the medical use of cannabis and 2) clarify provisions regarding the establishment of bona fide physician-patient, naturopathic physician-patient, and advanced practice registered nurse-patient relationships via telehealth. PSD, however, does not support HB 516 in one important area.

Traditionally, PSD does not support or oppose efforts to determine the question of which class of healthcare professional should, or should not, have the authority to work with controlled substances in Hawaii. Instead, PSD leaves such policy questions for the Legislature to determine.

However, PSD does not support this proposal in one very important area. PSD opposes the changes in HB 516 that removes the controlled substances registration requirements for physicians and advanced practice registered nurses who participate in Hawaii's Medical Use Of Cannabis Program. Since the beginning of Hawaii's Medical Use of Cannabis Program, state law has always required the participants who participate in the program to obtain a "registration". For example, practitioners, laboratories, dispensary retail

centers, and dispensary cultivation facilities must all be registered. More specifically, every class of healthcare professional (e.g., physicians and nurses) who make a “recommendation” for a patient to use medical cannabis has always been required to obtain a Hawaii controlled substances registration under section 329-32, Hawaii Revised Statutes (HRS). As a result, every participant in the program has had to obtain a controlled substances registration before participating and making recommendations for patients to use medical cannabis.

“Registration” is the primary way that practitioners are regulated in our system of laws. By registering, practitioners are required to keep records, engage in professional activities, and are prohibited from engaging in fraud, diversion and other criminal acts. PSD believes that as a result of registration, there have been few, if any, acts of misconduct amongst the medical cannabis practitioner community. As HB 516 seeks to remove such an important mechanism by changing existing definitions of physician and advanced practice registered nurse, PSD opposes that part of HB 516. .

This said, if it is the legislature’s intent to allow a naturopathic physician to participate in Hawaii’s Medical Cannabis Program, then PSD recommends that the definition of a “naturopathic physician” **include** the requirement to obtain a registration under section 329-32, HRS, consistent with the traditional and essential requirement for registration imposed by the legislature currently upon (allopathic) physicians and advanced practice registered nurses.

PSD would also clarify that we understand that there has been, and continues to be, discussions over the potential authority for naturopathic physicians to work with controlled substances. If the legislature would like to allow naturopathic physicians to give recommendations for the medical use of cannabis **it could certainly do so** and still require naturopathic physicians to obtain a registration for limited use in the medical cannabis program. To enact such a limit, PSD recommends that the legislature define a naturopathic physician as:

“Naturopathic physician” means a person who holds a current license to practice naturopathic medicine under chapter 455 and registered under section 329-32, provided such registration is restricted to participation in the Medical Use of Cannabis Program, as provided in Part IX of chapter 329, HRS.

Thank you for the opportunity to testify on this measure.