



MISSOURI HOUSE OF REPRESENTATIVES  
**WITNESS APPEARANCE FORM**

BILL NUMBER: <b>HB 2446</b>		DATE: <b>3/5/2024</b>	
COMMITTEE: <b>Professional Registration and Licensing</b>			
<b>TESTIFYING:</b> <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
<b>WITNESS NAME</b>			
<b>INDIVIDUAL:</b>			
WITNESS NAME: <b>ARNIE C. "HONEST-ABE" DIENOFF-STATE PUBLIC ADVOCATE</b>		PHONE NUMBER:	
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I am in Support of the Creation of this Board and the Licensing of this Field and Profession of "Naturopathic Medicine."



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**Naturopathic Doctors NDs need to be licensed in MO. Currently there are 26 states and US territories that with laws that license NDs. The Chief Medical Dr. of DHSS recently testified in a House committee that Missouri is short 1,000 doctors. These doctors would fill the gap.**



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WITNESS NAME: <b>EMILY HUDSON</b>		PHONE NUMBER:	
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March 5th, 2024 Testimony from Emily Hudson, ND, LPC to the Professional Registration and Licensing Committee of the Missouri House of Representatives in support of HB2446 which seeks to establish regulation for Naturopathic Physicians. Good afternoon Chairman Coleman, and esteemed members of the Committee, My name is Dr. Emily Hudson, and I am a Naturopathic Doctor and licensed professional counselor in St. Louis. I'm here today to express my strong support for House Bill 2446 and to urge each of you to vote in favor of this crucial legislation for the safety and health of all Missourians. States neighboring Missouri have already established licensure for Naturopathic Doctors, such as Kansas, Wisconsin, and Minnesota. While Illinois is close behind. A total of 26 states and territories offer licensing status to Naturopathic Doctors. (See Handout 1 for a map of states that grant licenses to NDs). House Bill 2446 aims to align Missouri with these states. I am not yet able to practice as I was educated, and it affects myself and my clients every day when I am unable to provide the care for them that they so desperately need and deserve. I'll be speaking to you briefly today about my background, the definition of a Naturopathic Doctor and our education, the safety, cost effectiveness, and how Naturopathic Medicine can benefit Missourians. My Background: Before becoming a Naturopathic Doctor, I worked as a critical care respiratory therapist at Barnes Jewish Hospital. During those years, I cared for patients, formed relationships with nurses and doctors, and gained insight into the medical system. It was this experience that inspired me to pursue a career in naturopathic medicine. My decision was not a rejection of conventional medicine; rather, it was driven by a desire to help people before they reached the point of chronic illness requiring intensive interventions like drugs and surgeries. What is An ND? I'm sure you have questions about what exactly a Naturopathic Doctor is. Naturopathic Doctors, or ND's are skilled practitioners of natural medicine, trained extensively as primary care physicians. Their education equips them to delve deep into a patient's health, seeking out underlying causes rather than merely treating symptoms. Disease prevention, healthy lifestyles and natural therapies are at the foundation of the practice. Licensed NDs conduct thorough physical examinations, gather detailed health histories, and diagnose and treat illnesses. They employ conventional methods such as laboratory testing, imaging, and other diagnostic procedures as needed, and they make referrals to medical specialists when necessary. Education: Before enrolling in Naturopathic Medical school, prospective naturopathic doctors must first complete a bachelor's degree, which includes prerequisite coursework in biology, chemistry, and other basic sciences. This ensures they have a solid foundation in the basic sciences crucial to our medical practice (please see Handout 2 for all accredited Naturopathic Medical schools and a list of required prerequisites for admission). Following this, Naturopathic Doctors undergo a rigorous four-year, in-residence doctoral-level program at one of seven accredited Naturopathic medical schools. These programs cover a wide range of medical disciplines, including anatomy, physiology, pharmacology, and clinical diagnosis. This core curriculum is similar to that which a Medical Doctor goes through, but they differ in that

naturopathic medical education also emphasizes preventive medicine, nutrition, botanical medicine, and other natural therapies. This comprehensive education equips us with the knowledge and skills necessary to address the complex health needs of our patients. Naturopathic doctors learn conventional medical sciences as a foundation, upon which they build a thorough understanding of holistic, non-toxic therapies, and develop skills in diagnosis, disease prevention, and maintaining wellness. The curriculum at accredited programs requires 4,200 hours over four years, with approximately 1,400 of those hours dedicated to clinical training, including significant patient management responsibilities.

**Licensing Exams:** Naturopathic Doctors must sit for national licensing exams called NPLEX examinations, which consist of two parts: the Basic Science Examination (Part I) and the Clinical Science Examination (Part II). These exams assess the candidate's knowledge and competence in various areas of naturopathic medicine. Upon passing both parts of the NPLEX exams, candidates become eligible for licensure as Naturopathic Doctors in their respective states.

**Cost savings and Effectiveness of Naturopathic Medicine:** You might hear arguments from the opposition that will tell you Naturopathic Medicine will raise healthcare costs, but this is untrue. Many of the services provided by naturopathic doctors are those with the strongest evidence of cost savings. Many patients, for example, visit Naturopathic Doctors to treat chronic pain, most commonly back pain. Many studies have documented cost savings resulting from use of naturopathic physicians to reduce pain. Not only does this save cost, but it also has the potential to ease the burden of the opioid crisis, which is especially devastating in Missouri. Overall ND's prescribe far fewer pharmaceuticals than their MD counterparts, and instead lean heavily on physical medicine, nutritional interventions, supplements, herbal medicine and counseling. (See Handout 3 for more details about the benefits of naturopathic medicine)

**The Evidence is abundant:** The opposition might say there isn't enough evidence to support the use of Naturopathic Medicine. I'd like to dispel this right away, there are tens of thousands of studies indicating the benefits of Naturopathic Medicine and the tools they use such as nutrition, physical medicine, targeted supplements such as vitamins and minerals, herbal medicine and more. (Please reference Handout 4 for a sampling of these types of research studies as it pertains to Naturopathic Medicine's role in chronic disease like diabetes, heart disease, and asthma.)

**Safety of Naturopathic Medicine:** I understand that there may be concerns and questions about the modalities or treatments used by naturopathic doctors. However, I want to assure you that we are trained to utilize evidence-based practices and to prioritize patient safety at all times. Naturopathic medicine integrates traditional healing wisdom with modern medical science to provide comprehensive care that addresses the underlying causes of illness and promotes long-term health and wellness. (Please see Handout 5 outlining the safety of Naturopathic Medicine). Of note are the impressive safety profiles in Washington and Oregon, where ND's have some of the widest scope of practice including minor office procedures and independent prescription rights.

**With a critical primary care shortage, there is a big need for support:** Missouri faces a critical shortage of Primary Care Physicians. A yearly state by state ranking of health measures, ranked Missouri 47th overall in 2022. One significant area of concern is the high rate of preventable hospitalizations among adults, age 18 to 64. For instance, hospitalizations for diabetes complications, which should typically be avoidable with proper management, remain alarmingly common. Missouri faces a critical shortage of Primary Care Physicians. Expanding the pool of primary care providers and emphasizing preventive care, such as that provided by Naturopathic Doctors, could play a pivotal role in addressing this issue. It's important to highlight that naturopathic doctors don't seek to replace or compete with conventional medical doctors. Instead, we aim to complement existing healthcare options, offering patients additional choices for their healthcare needs. In states where naturopathic doctors are licensed, patients benefit from a wider range of healthcare options, leading to improved health outcomes. I urge you to consider the benefits that licensure for naturopathic doctors would bring to the people of Missouri. By supporting House Bill 2446, you will not only ensure access to safe and effective healthcare options but also promote greater choice and autonomy for patients across the state. Thank you for your time and consideration. I am happy to answer any questions you may have.

Emily Hudson, ND, LPC  
President of the Missouri Society of Naturopathic Physicians



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<b>WITNESS NAME</b>			
<b>INDIVIDUAL:</b>			
WITNESS NAME: <b>EMMALYN PRATT</b>		PHONE NUMBER:	
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Before I introduce myself, I would like to take this opportunity to thank everyone present today. I appreciate any amount of time you have spent on house bill 2446 thus far. My name is Emmalyn Pratt and I am a third year naturopathic medical student at Sonoran University of Health Sciences in Tempe, Arizona. Prior to Sonoran, I attended Simpson College in Indianola, Iowa, where I studied Health and Exercise Science, biology, and health services leadership. When I complete my doctoral degree next year, I will have attended 8 years of higher education, and will likely continue my education as a resident physician upon graduating and taking Part II of the Naturopathic Physicians Licensing Exam. Through my efforts to be present today and the words I am about to speak, I hope that you will feel my unwavering dedication to serving the first responders of Missouri and certitude that our state needs naturopathic physicians. While I'm finally starting to see the light at the end of the tunnel when it comes to completing my doctorate in naturopathic medicine, it was no easy task getting to this point. Upon graduation, I will have taken more than 400 credit hours. I can tell you, with great certainty, that those classroom hours are just a fraction of time we spend with our studies. In our first 2 years of medical school, countless hours are spent learning anatomy, physiology, biochemistry, genetics, microbiology, immunology, pathology, and pharmacology. The same basic sciences as an MD or DO. I think it's important for people to understand that becoming a licensed naturopathic physician is no walk in the park just because it isn't an MD or DO program. We attend a rigorous, 4 year doctorate level program that includes classroom education and many hours of clinical experience. And of course, we also take a licensing exam which for us is the two part naturopathic physicians licensing exam, known as NPLEX for short. While I completely understand that I made this decision for myself, it's still disappointing to think that I moved halfway across the country away from my family and friends to pursue a career that is not widely accepted in my home state. Most people ask me, where are you going to go and what do you want to do when you're done with school? At this point in time, the answer to that question is partially up to you. Typically, I must explain that naturopathic doctors are not nationally regulated, but rather on a state-by-state basis and Missouri does not provide licensure for us. So, unfortunately, people leave the midwest to attend naturopathic medical school and often they don't come back. They stay in the Phoenix area, the San Diego area, the Portland area where they attended school or move to another state that licenses naturopathic physicians. There are now 26 of those. Based on the amount of people who have expressed their eagerness for my return to our hometown of Kearney, Missouri, I am confident that many other communities in our state must also long for this type of healthcare. Although this type of healthcare is a want for many, healthcare in general is a need for others as the country as a whole experiences shortages in providers. We have an aging population of people with chronic disease in this country and as naturopathic physicians we are trained to treat and prevent those illnesses and so much more. Placing naturopathic doctors within our communities also elicits an opportunity to educate children on how to nourish their bodies and

implement preventative health habits from a young age. Education is a major part of the role of a naturopathic physician as one of our principles is Docere, which means doctor as teacher. The education piece of this practice can be life-altering and is one of my favorite aspects of this profession. That's why I plan to devote a portion of my practice to serving first responders, especially firefighters as they experience occupational related exposures that increase their risk for developing conditions such as cancer and cardiovascular disease. Without a career change, these exposures are inevitable, so I want to meet them where they are and optimize their health in areas that we can control as a form of prevention. The implementation of the Missouri Fire Fighters Critical Illness Pool cancer trust, and the addition of the behavioral health component of the trust exhibit great support for our first responders. While I know the house and senate have supported these programs and I fully support and deem them essential, my goal is to establish a practice that further supports first responders and helps increase success rates and health outcomes. As the daughter of a fireman with over 35 years of service, I feel that utilizing my education to support them is the least I can do as I have first hand experiences of the sacrifices that first responders make for their communities. I believe naturopathic physicians are an integral piece of our healthcare system. One of the biggest benefits of seeing a naturopathic physician is that time spent with patients drastically exceeds time spent with conventional doctors. Establishing trust with a patient and learning about what impacts their health helps us get to the root cause of their health concerns. As a student clinician, I have had a patient in tears over the fact that a medical care provider was finally listening to them about their pain. This particular patient had flown from a state where NDs are unlicensed to seek our care. I believe there is absolutely a time and place for all types of medicine and it is a blessing for us to live in a country with access to conventional medicine as well. This is why an integrative and collaborative approach to health care should be the future of healthcare. Integrative cancer expert Dr. Nathan Goodyear, MD who practices in Scottsdale, Arizona is a perfect example of what integrative, collaborative healthcare can do for patients. Alongside naturopathic physicians and other healthcare professionals, Dr. Goodyear of Brio Medical combines conventional and alternative methods to treat cancer and other chronic illnesses and yields results only achievable with such an innovative approach to healing. Naturopathic physicians have the ability to meet patients where they are. If a patient wants symptom relief, we can provide that whether it be with botanical medicine or pharmaceuticals. If a patient is ready for a deep dive into optimizing their health, we can work on the foundations of health and change their lifestyle for the better. Or perhaps, we even work alongside a specialist with a collaborative approach to managing someone's care both conventionally and naturopathically. Conventional and naturopathic medicine can both be extremely powerful and I feel it is truly a disservice to the citizens of Missouri to inhibit access to the latter of the two. Naturopathic medicine is an amazing, transformative type of medicine that I hope can become the norm in our state. Despite the entirety of my educational career, my passion for first responders, and my determination to help others; despite it all, I am unable to return to my home state and pursue this career with a full scope of practice, or with the right to title protection for what I will soon become, a dedicated Naturopathic Physician. To be honest, I had difficulty choosing a career because I wanted to provide people with such a well rounded healthcare experience no matter the segment I went into. I knew I wanted to help people in more than one aspect of health. I couldn't see myself becoming a personal trainer, a dietitian, an exercise physiologist in cardiac rehab, because I felt I would be limited in what I could offer my clients or patients. I felt the same about training as an MD or DO. Primary treatments are pharmaceuticals. As I mentioned, I think an integrative approach to health care is key, so I would of course offer the pharmaceutical route for patients when indicated, but having other options in my toolbox is essential to me. Medicine shouldn't be one size fits all and as a future naturopathic physician, I promise to provide personalized care to each and every patient. That concludes my prepared statement. I'm happy to try to answer any questions that I can.



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WITNESS NAME: <b>JON W. MORGAN</b>		PHONE NUMBER:	
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WITNESS NAME: <b>LANCE LURIA, MD, FACP ABOIM</b>		PHONE NUMBER:
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My testimony is in support of licensure for Naturopathic Medicine. As a board certified physician in both internal medicine and integrative medicine and and a member of the American Board of Integrative Medicine and a board member of the American Board of Physician Specialties.As a VP and Chief Medical Officer for Mercy Managed Care, I also spearheaded a department of Integrative Medicine for 6 years. We were the “Delta” force of integrative medicine care management and had remarkable success in substantially improving the lives of chronic pain patients, including the avoidance of costly spinal cord stimulators for chronic back pain patients.Modern mainstream medicine offers great high tech interventions but the average office visit is around 20 minutes for a primary care provider, which likely may include ordering referrals, imaging. Labs, and prescription medications. Naturopathic physicians may initially spend 90 minutes with a patient and go over a host of patient concerns and issues as part of a holistic approach. Naturopathy fills the void between what the patient can benefit from and the very limited time and lack of expertise that standard mainstream practices can offer.Naturopathy offers high touch/low tech strategies that can be very cost-effective. From expertise on selecting appropriate Botanicals, supplements , nutritional counseling and lifestyle behaviors which will promote self-healing and well-being, while not undermining mainstream medical interventions and recommendations. Having retired from my previous role as a VP/CMO, am currently working with a company named Tellus Wellness. The offer to self-funded companies, a network of vetted complementary providers, including Chiropractic, massage, acupuncture, nutrition, and Naturopathy. These are part of the company’s added benefits to their members with the goal of improving their health and well-being through high touch/low tech cost effective modalitiesNaturopaths: A whole person/holistic approach by highly credentialed board certified naturopathic physicians who complement standard mainstream management, covering all the bases patients are looking for but can’t access currently.





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<b>WITNESS NAME</b>			
<b>INDIVIDUAL:</b>			
WITNESS NAME: <b>JEFFREY D. DAVIS, DO</b>		PHONE NUMBER:	
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<b>WITNESS NAME</b>			
<b>BUSINESS/ORGANIZATION:</b>			
WITNESS NAME: <b>JOANNE LOETHEN MD</b>		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME: <b>MISSOURI STATE MEDICAL ASSOCIATION</b>		TITLE: <b>PHYSICIAN MEMBER</b>	
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CITY: <b>KANSAS CITY</b>		STATE: <b>MO</b>	ZIP: <b>64131</b>
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My patient was just over 12 months old. It was her first time to our clinic. As part of the usual protocol of a child’s check up, we measured her length, weight, and head circumference. Unfortunately, I needed none of those measurements to tell me how malnourished she was. At a year old, she weighed the same as the 4 month old I had seen only moments before. She was emaciated. I asked the parents if anyone has expressed concerns about her growth. Over the next hour, we learned the child had been seeing an ND - naturopathic doctor. She was tested for allergies at a young age for reasons the parents could not recall. They were subsequently told about a myriad of food allergies the child reportedly had based on copies of test results the parents brought with them - labs that after review were clinically inappropriate for a patient of her age. They were instructed to strictly avoid countless foods and formulas based on the results from their ND. Meanwhile her weight became stagnant and her development lagged behind what was expected of her age. Rather than refer to a physician who specializes in growth failure and delays, or even to a board certified allergist if it was truly felt her food allergies were that severe, the family was instead told to continue alternative remedies and avoid various foods. We know the first years of a child’s life is crucial to their future development - physically, mentally, and emotionally. It pains me to recall this case today knowing that this child’s life would forever be changed. This is just one story. Others include patients with cancer who postpone gold standard medical treatment to pursue alternative therapies and, as the cancer progresses and fails to respond to these “natural” treatments, later learn that it’s too late to provide them anything but palliative options. Or the patient given an unregulated herbal therapy who ends up in the emergency department for liver failure. There are reasons we have such high standards for physicians in terms of how many direct patient care hours are required and why it is insufficient for residents to merely “shadow” to fulfill their clinical requirements like some professions allow. Lectures and studying books are important, but you learn how to be a doctor by seeing patients, day after day, year after year, for the over 12,000 hours of clinical experience required across a physician’s training. Yet, this legislation proposes to allow someone with a fraction of clinical experience to practice one of the most challenging specialties of medicine - Primary Care. Not only does naturopathy training involve fewer than 1000 “clinical” hours (compared to physicians who require >12,000 direct patient care hours), there is no guarantee that these clinical naturopathy hours include direct patient care or include any substantial experiences in pediatric care, elderly care, or the care of complex and hospitalized patients. We are happy to provide resources on the education and training differences between physicians and those who practice naturopathy. Missourians deserve the highest quality of medical care, no matter where they reside in our state. Protect Missourians by preserving the practice of medicine to be practiced by trained and licensed physicians. I urge you to oppose HB 2446.



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<b>WITNESS NAME</b>			
<b>BUSINESS/ORGANIZATION:</b>			
WITNESS NAME: <b>RACHEL WELLINGTON</b>		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME: <b>AMERICAN SOCIETY OF PLASTIC SURGEONS</b>		TITLE:	
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<b>THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.</b>			

Dear Chair Coleman, Vice Chair Parker, and Ranking Minority Member Brown: On behalf of the American Society of Plastic Surgeons (ASPS), I am writing in opposition to House Bill 2446 (H.B. 2446). ASPS is the largest association of plastic surgeons in the world, representing more than 8,000 members and 92 percent of all board-certified plastic surgeons in the United States – including 175 board-certified plastic surgeons in Missouri. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety. H.B. 2446 would allow naturopaths – who are not physicians – to perform and oversee procedures that fall squarely within the practice of medicine. This is ill-advised. As surgeons, we encourage you to uphold the highest level of patient care that has been established and allow the practice of medicine only by licensed physicians who meet appropriate education, training, and professional standards. Under the current definition, a naturopath – who is not an allopathic (MD) or osteopathic (DO) physician surgeon – can alter superficial tissues during minor office procedures; during laser and other energy-based device procedures; and during intradermal, subcutaneous, or intramuscular injections. These procedures and modalities all fall squarely under the definition of surgery that must be performed or delegated by a licensed physician surgeon. Yet, H.B. 2446 expressly authorizes naturopaths who, again, are not doctors of medicine, full freedom to do them all. Our concerns are further compounded by H.B. 2446’s potential mechanisms for expanding the scope of naturopaths. Specifically, the bill creates a new Board of Naturopathic Medicine that is granted far too much authority. While the bill’s inclusion of one MD/DO board member is appreciated, we strongly believe that non-medical professionals should not be determining what level of medical training is appropriate. State medical boards, including Missouri’s, are comprised of physicians and given the authority to self-regulate their profession. That is because they are the highest authorities on the practice of medicine. Naturopaths are not the highest authorities on the practice of medicine, and as such, should not be authorized to make these kinds of decisions. The rationale is derived from the clear difference in training that physicians and naturopaths complete. Plastic surgeons must attain a core medical and surgical education while completing ten to twelve years of training, which includes increased responsibility and decision-making authority in the hospital setting. Board-certified plastic surgeons must: (1) earn a medical degree; (2) complete six to eight years of full-time experience in a residency training program accredited by the Accreditation Council for Graduate Medical Education (ACGME); and (3) the last three years of training must be completed in the same program. Ultimately, surgeons will train as much as four-times-as-long as naturopaths. The education and training of a naturopath is in no way comparable to that of a medical doctor, making it dishonest to refer to naturopaths as “naturopathic doctors” or “naturopathic physicians”; thus, we also appreciate that the bill would prohibit these individuals from referring to themselves as such. If you are still unconvinced that expanding the scope of practice for naturopaths would be a mistake, I

encourage you to examine the ongoing concerns in Arizona with naturopaths in their state performing cosmetic procedures, such as breast augmentations and gluteal fat-grafting (commonly known as “Brazilian Butt-Lifts” or “BBLs”), that has resulted in shocking outcomes. To further complicate matters, the state’s board of naturopathy has refused to discipline their licensees or condemn these practices – creating a major patient safety dilemma in the state. Thank you for consideration of our comments. Please do not hesitate to contact Joe Mullin, ASPS State Affairs Manager, at [jmullin@plasticsurgery.org](mailto:jmullin@plasticsurgery.org) or (847) 981-5412 with any questions or concerns. Sincerely, Steven H. Williams, MD President, American Society of Plastic Surgeons