

From: Melissa Immesoete [<mailto:mimmesoe@pps.net>] **Sent:** Friday, February 3, 2017 4:18 PM **To:** OBNM Info <OBNM.Info@hrlb.org> **Subject:** Medical Statement needed for Special Education Eligibility

Dear Ms. Anne Walsh,

I am a special education teacher who conducts Early Intervention (EI) and Early Childhood Special Education (ECSE) evaluations for children birth to age five within Portland Public School District. I am writing to you at the suggestion of Jeremy Mikolai, ND at the Center for Natural Medicine in Portland, OR.

I am evaluating a 5-year old child to consider the eligibility of Autism Spectrum Disorder, and one requirement for this eligibility category is a signed document citing any suspected or known physical/health/medical conditions.

The OARs for Special Education designate who can legally sign this document:

“Medical Statement” is defined as a written statement issued by a physician licensed by a State Board of Medical Examiners.

“Health Assessment Statement” is defined as a written statement issued by a nurse practitioner licensed by a State Board of Nursing specially certified as a nurse practitioner, or by a physician assistant licensed by a State Board of Medical Examiners. Both a nurse practitioner and a physician assistant must be practicing within his or her area of specialty.

I have talked Alan Garland, who is the EI/ECSE Program Policy & Procedures Director at the Oregon Department of Education (ODE), and I have been told that legally Naturopathic Doctors cannot sign the medical/health assessment statement. However, I am writing to you to see if the Oregon Board of Naturopathic Medicine has petitioned or challenged ODE’s antiquated definitions in their OARs.

The child in question has been seen by his Naturopathic Doctor for several years, and he has documented the child’s developmental history as well as his own history of concerns. Asking the child’s single parent to find time to bring her child to an unfamiliar Medical Doctor for the sole purpose of obtaining a signed document in order to meet the legal requirement for this eligibility is unreasonable, in my opinion.

Alan Garland told me that I would probably be spinning wheels by asking you about this, but I feel I have to on behalf of the families that we meet whose Primary Care Physicians are Board licensed ND’s. Dr. Mikolai thought perhaps you would know of others who have run into this problem.

Thank you very much for your time.