Brittany Krake, ND, MDR 049 SW Porter St Portland, OR 97201

February 13, 2019

Subject: Oregon Association of Naturopathic Physicians Pay Parity Bill

Dear Senate and Health Care Committees,

My name is Dr. Brittany Krake - I am a licensed Naturopathic Physician and a Resident Physician at the National University of Natural Medicine. I would like to share my experience working as a new naturopathic physician (ND) to show the importance of this profession in the delivery of quality healthcare in the state of Oregon, and the barriers that we face in trying to deliver this care.

For your convenience, a brief summary of naturopathic medical training is provided below:

Naturopathic medical students attend institutions that are accredited by the Council on Naturopathic Medical Education (CNME), an accrediting agency that is recognized by the United States Department of Education. There are currently seven (7) accredited institutions, all members of the Association of Accredited Naturopathic Medical Colleges (AANMC), and one (1) candidate program. Since 2007, the Princeton Review of Medical Schools has included U.S. Naturopathic Schools of Medicine in its annual review of the best 168 medical schools in the country.

Our faculty members have terminal degrees (ND/NMD, MD, DC, PhD, L.Ac) and professional credentials. Our schools provide the foundational coursework in biomedical and clinical sciences equivalent to that of allopathic (MD) and osteopathic (DO) medical schools. In addition, naturopathic medical students receive extensive education and clinical training that emphasize disease prevention, chronic care management, and whole-person wellness, frequently reducing the need for expensive prescription drugs, surgeries or other treatments, as well as time lost to illness, all of which have significant economic impact.

After the second year of academic study, students must complete Part I of the Naturopathic Physicians Licensing Exams (NPLEX), a standardized exam covering biomedical sciences needed for clinical training. After two additional years of study and a minimum of 1200 hours of supervised clinical training, students are eligible to take NPLEX Part II that covers clinical science competencies needed to practice as a naturopathic physician. Although covered in the NPLEX Part II, we are required to take additional elective exams on the topics of pharmacology and minor surgery to

show significant competency in these common primary care modalities in order to be eligible for licensure in Oregon. These NPLEX licensing exams are parallel to those required for medical doctor (MD) and doctor of osteopathy (DO) credentialing.

Many graduates of naturopathic medical schools go on to complete residencies for additional post-doctoral training. During my residency, I have had the pleasure of working at the National University of Natural Medicine (NUNM) Health Centers and Community Clinics in the Portland-Metro area, which offer services to patients with varying insurances and coverage statuses. At our clinic, we provide a full spectrum of primary care services, from preventative wellness exams to emergency primary care, and from referrals to in-house complex medication management. I have also had the distinct opportunity to complete rotations at Oregon Health & Science University (OHSU) in Integrative Medicine, as well as Outside In and Central City Concern, which provide primary care and specialty services to Oregonians experiencing homelessness and/or economic hardship.

As I contemplate my future as a ND, taking into account the extensive burden of student loans after attending the 8+ years required to graduate from undergraduate university and medical school, I wonder how I will be able to afford providing quality healthcare services in the insurance-based model. My colleagues and I have been repeatedly informed that we are considered less desirable candidates for employment merely due to the fact that we are reimbursed for our services as NDs at a much lower rate. Despite my abilities to provide highly-trained and skilled healthcare services, this places me at a distinct disadvantage compared to my MD and DO colleagues in the effort to seek gainful employment.

Additionally, over the last many years, there has been a notable decrease in primary care physicians (PCP) nation-wide, due to generational changes and decreased earning potential as a primary care MD/DO. If medical doctors are struggling to keep their clinic doors open, imagine doing so at an $\sim\!60\%$ reimbursement rate. NDs are primed to help fill this ever-increasing shortage of PCPs, but cannot reasonably be expected to keep a business running without pay parity.

Another important factor of pay parity is the increased financial burden patients assume for choosing to receive primary care services through a ND. As an example, MD, DO, and ND primary care physicians are equally qualified to conduct annual wellness exams. These exams include obtaining medical, social, immunization and family history, performing and interpreting physical examinations, and providing anticipatory guidance regarding which preventive services, labs and imaging should be conducted over the year to come. If this office visit cost \$200, the financial burden forwarded to the patient after an insurance company reimbursed the ND at 60% would be \$80, whereas the patient who chose to have these services completed with a MD or DO would owe nothing. There is inherent discrimination against both NDs and the patients who choose to have services completed through licensed NDs.

The increased financial burden on patients deters them from seeking care from these otherwise well-qualified providers.

Oregon has long been on the cutting edge of providing quality medical services to all of her people and is known for setting trends that the rest of the country looks to in order to determine whether healthcare innovation can be successfully implemented. In this moment, you have the opportunity to support Oregonians with:

- **Freedom** for patients to choose a healthcare provider that fits with their personal needs and preferences;
- **Decreased financial burden** on patients when choosing naturopathic physicians for their healthcare services;
- **Equality** amongst medical providers who have received training at nationally accredited medical schools and have passed multiple national licensure examinations;
- **Opportunity** for new NDs to establish successful practices, obtain employment equal to their training, and to be a part of medical innovation for the benefit of all Oregonians; and
- **Cutting Edge Healthcare** that promotes true integration between medical providers, allowing for coordinated care and better patient outcomes.

I am asking that you vote yes on the Naturopathic Physician Pay Parity bill.

Sincerely,

Brittany Krake, ND, MDR Naturopathic Physician