While the intent of this bill may be good, its implementation is of great concern.

Firstly, there is no emergency declaration needed as there is no emergency within the alternative practitioner practices. The declaration of an 'emergency' would demand proof of such, yet this bill cites only the benefits derived from these practitioners.

Secondly, many branches of healing arts and coaching provide training and Codes of Ethics and Practice. In our case, Bach Flower Certified Practitioners (BFCPs) who are members of the Bach Flower Practitioner Alliance (BFPA) should be exempt from this bill as they fall under the supervision of the Bach Flower Practitioner Alliance, which offers specific training and guidelines on ethical practice. I have been conducting practitioner guidance and oversight internationally since 1998.

To become a practitioner, an applicant must complete

- 1) Three Levels of Training. The two higher levels are taught by master teachers with specialized training.
- 2) 6 months to one year of supervised home study with mentor oversight
- 3) completion of proof of practice including 3 client case studies of 3 consecutive visits each, with mentor feedback
- 4) additional study and reflection in the ethics of practice
- 5) agreement to adhere to the Practitioner Promise, which is a code of ethics for practice

Our organization provides professional guidelines and oversight for our practitioners. Bach Flower Certified Practitioners should not be included in HB 2493.

Finally, if such a registry is VOLUNTARY, then this seems to be merely a vehicle for the collection of registration fees and the creation of a new state job, while private healing academies are already implementing this oversight themselves. Those practitioners who may elect to seek registration with the state could prove to be those least worthy of it, and although they may agree to your terms of registration, they may lack the actual skills, knowledge and understanding required of a bonafide alternative practitioner.

Thank you.

Nancy Buono, Director Bach Flower Education Bach Flower Practitioner Alliance Living Enrichment