



Chair Patterson, Vice-Chair Hayden, Members of the Committee:

Re: Please Oppose SB 408

The Oregon Association of Naturopathic Physicians (OANP) urges your opposition to SB 408. We are concerned that SB 408 will prevent trained providers from practicing to the top of their education. It will stifle access to timely and appropriate care as this process will take time to move through the Oregon Health Authority (OHA) review committee. These delays can directly impact patient care with unnecessary administrative hurdles through the practice review committee process.

This is not the first time legislators have pursued an idea to help mitigate the challenges and frustrations that arise from legislative efforts to change medical scope of practice. Under the leadership of Chair Laurie Monnes Anderson in 2008, the Senate Health Care Committee put forward a concept for a pilot program of a similar endeavor. SB 408 is not likely to be the last of its kind to be introduced.

SB 408 creates an additional, costly process within an already lumbering agency. Passage of this bill amounts to ceding legislative authority to an un-appointed, un-elected task force with citizen members who are roundly un-objective and likely beholden to their professional organization's policy objectives.

As written, the task force gives a "recommendation" to the legislature, but we have seen evidence from other states - and all the way up to the FDA and federal agencies - that the recommendations are accepted without scrutiny. SB 408 also allows for multiple organizations' providers who claim impact to their professions to participate. This dilutes the impact of the professional group that is seeking a change to its scope.

OANP is also concerned that this bill allows for the "establishment or revision of scope-of-practice requests" creating an environment where a provider group can request a reduction in a professions scope of practice and, if successful, would directly and negatively impact patient care and access to care across the state.

Provider groups request a scope of practice changes based on the needs of their patients, progress in technology and devices, and their ongoing training and experience. The current legislative approach already leaves the burden of proof on the providers who are requesting changes and their patients, who would benefit. Additionally, each scope of practice change is implemented by the respective licensing

boards which are responsible for adopting rules to protect public health and public safety. SB 408 would delay innovation by adding additional burden and patient care may suffer as a result.

Finally, SB 408 should have a massive fiscal impact to the state and we have concerns about the potentially excessive use of taxpayer dollars needed for Oregon Health Authority staff to complete this process. These funds could instead go to fulfilling rural provider incentive programs or into increasing Medicaid services. In addition, it is not clear if there will be a limit to the amount of requests that the OHA can reasonably work through in the biennium.

OANP appreciates the complexities of scope of practice legislation, but adding a potentially costly administrative burden that would stifle innovation is not the answer.

Please vote NO on SB 408.

Sincerely,

Sara Love, ND

OANP Legislative Committee, Chair

Oregon Association of Naturopathic Physicians

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