



June 10, 2011

Margaret O’Kane, President
National Committee for Quality Assurance
1100 13th St, NW Suite 1000
Washington, DC 20005

Dear Ms. O’Kane:

The American Association of Naturopathic Physicians is the nation’s only professional organization representing licensed naturopathic doctors (NDs). Naturopathic physicians, highly trained primary care providers, play a significant role in reducing the rate and impact of chronic disease in underserved populations. Naturopathic Medicine, as defined by the US Department of Labor, is to “Diagnose, treat, and help prevent diseases using a system of practice that is based on the natural healing capacity of individuals. May use physiological, psychological or mechanical methods. May also use natural medicines, prescription or legend drugs, foods, herbs, or other natural remedies.”¹ We write to you today regarding the leadership role NCQA is taking on the expansion of Patient Centered Medical Homes, with a request to include naturopathic doctors in the list of eligible providers.

You may be unaware that naturopathic physicians are licensed to provide primary care in Alaska, California, Montana, New Hampshire, Utah, and Vermont. In fact, naturopathic doctors in the State of Vermont are eligible for Medicaid reimbursement and represent 6% of the state’s primary care physician population. Across the country legislatures are expanding scope and access to naturopathic medicine. Arizona, Hawaii, Oregon and Washington allow NDs full prescription authority, and Hawaii expanded naturopathic scope of practice to include IV Therapy and minor surgery, in addition to prescribing authority. In total, 16 states the District of Columbia, Puerto Rico and the Virgin Islands license NDs, and more than 10 states are actively engaged in licensing efforts.

NCQA’s programs and initiatives have evolved over the years to reflect the changing nature of health care, including recognition of nurse practitioners and physicians assistants. As is evidenced by the chart below, the training and scope of practice for NPs and naturopathic physicians demonstrates that our licensed graduates of accredited naturopathic medical schools are more than qualified to provide primary care services.

¹ <http://www.onetonline.org/link/details/29-1199.04>

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State of Oregon	Naturopathic Physicians	Family Nurse Practitioners
Scope of Practice	Can diagnose and treat any condition	Can diagnose and treat any condition
Drugs Controlled Drugs	Can prescribe "Legend" drugs Schedule II-V	Can prescribe "Legend" drugs Schedule II-V
Basic and Clinical Sciences	224.50 credits	64 credits
Supervised Clinical Practice	1548 hours	760 hours
Pharmacology	72 hours	45 hours

NCQA's development of quality standards and performance measurements will benefit from data relating to naturopathic medical care. For example, in 2008, a study on low-back pain funded by the National Center for Complementary and Alternative Medicine found that the use of naturopathic medicine resulted in better overall health and improved quality of life, reduced absenteeism and reduced costs for other treatments and pain medication. The net savings for the group of 70 warehouse workers was \$1212 per participant.²

Preliminary results from a 2010 randomized controlled pragmatic trial of the whole practice of naturopathic medicine for Canada Post employees at risk for cardiovascular disease, concluded total direct costs of naturopathic treatment used to attain one year of healthy living were \$1,477 (as compared to \$6,631 for anti-hypertensive medications, \$6,134 for statins, and \$4,238-\$7,829 for smoking cessation programs). The study projects that 3.3 out of every 100 workers using naturopathic medicine will avoid a major cardiac event they would have suffered without any form of lifestyle intervention. At least one person will live who would have otherwise died.³

The naturopathic medical profession stands ready to support NCQA's goal and vision to "transform health care quality through measurement, transparency and accountability," by serving as eligible providers in the programs you accredit and the your data-driven initiatives used to drive public policy. As noted, naturopathic doctors significantly impact health outcomes. Utilization of naturopathic medical training in primary care, preventive medicine and the treatment of chronic care also stands as a solution to the growing shortage of primary care practitioners. In 2005, researchers from Sam Houston University conducted a study to determine what impact designating naturopathic doctors as primary care providers would have on the number of health professional shortage areas (HPSAs). In the seven states selected, three of the 93 counties lost HPSA status. In extrapolating the data across all 50 states, the authors concluded that 33 to 142 counties could lose HPSA status entirely.⁴ In the words of the authors, "the impact of a fully diffused profession could dramatically reduce the number of HPSAs should the Bureau of Health Profession count NDs on par with medical doctors MDs."⁵

² <http://nccam.nih.gov/research/results/spotlight/070708.htm>

³ Dugald Seely, Bsc, ND, MSc., Patricia Herman, MS, ND, PhD, "Systemic Review of Cost Effectiveness of CAM" American Association of Naturopathic Physicians, August 2010.

⁴ Donald Patrick Albert, Ferry Butar Butar, "Estimating the de-designation of single-county HPSAs in the United States by counting naturopathicphysicians as medical doctors" *Journal of Applied Geography*, Volume 25, Elsevier 2005 pgs. 271-285.

⁵ Ibid.

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The AANP requests the opportunity to meet and dialogue on how naturopathic doctors can support your work and continue to serve as primary care providers, as mandated in states' laws. We are confident that we can demonstrate to you the value of expanding the list of eligible providers for Patient Centered Medical Homes.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen E. Howard". The signature is fluid and cursive, with the first name "Karen" and last name "Howard" clearly distinguishable.

Karen E. Howard

Executive Director