Serving Veterans within the VHA: A Role for Naturopathic Physicians

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American Association of Naturopathic Physicians

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1.0 Introduction

Given the growing interest in and research supporting complementary and integrative health and medicine, the trend is toward improved understanding and integration of providers that are federally recognized, state regulated experts. The need for greater understanding among health professions is well documented, with surveys demonstrating a preponderance of patients preferring or using complementary and integrative approaches (though often without proper guidance). Given that many of these approaches can improve outcomes, reduce cost, and increase patient satisfaction, integration has multiple potential benefits.¹

Likewise, mixing complementary, integrative and conventional approaches without guidance can produce harm, solidifying the importance of patients being able to access expert guidance. One such expert is the licensed naturopathic physician. Although naturopathic medicine’s origin is based in traditional healing methods including diet, mind-body practices and lifestyle, as well as other methods for re-establishing and preserving health, the modern naturopathic physician is also trained and competent in thoroughly modern diagnostic, treatment and preventive methods, and uses them in practice when indicated. Given the overwhelming interest expressed by veterans, VHA administrators, and lawmakers to improving the health of our veterans, given the agency’s watchwords for care—“personalized, proactive, and patient driven”—and given the value that credentialed naturopathic physicians could bring to this process, the Veterans Health Administration (VHA) should be fully supported in its efforts to integrate naturopathic physicians into the VHA at its earliest opportunity.

2.0 Perceptions about Naturopathic Physicians

Those familiar with credentialed naturopathic physicians understand the credibility, physician status, and practice scope and style of these providers. The naturopathic profession, as represented by the American Association of Naturopathic Physicians (AANP), maintains rigorous standards for its members, including the requirement to graduate from a naturopathic college or university accredited by an agency recognized by the U.S. Department of Education and the passage of national board examinations. As a result, naturopathic physicians enter the profession with the core competencies necessary to provide patient care as independent primary care physicians (PCPs) as well as being highly valued providers within large, sophisticated tertiary institutions in integrative care settings.²


As with all professions, a few individuals have represented themselves as licensed and qualified without having the commensurate training, mostly in jurisdictions where the profession was not regulated with title protection; in effect, in a regulatory vacuum. Unfortunately, the media, public, doctors, and other health professionals exposed to these individuals may not always understand the difference between someone calling him/herself a naturopath and a qualified, credentialed, naturopathic physician. The naturopathic profession has undertaken, and continues to undertake, an aggressive public education effort. However, because these unqualified individuals often represent themselves as doctors to the public, there may still be some misconceptions on how naturopathic physicians have received accredited physician-level training, have a broad scope of practice, team with other providers, and – as with every other physician type – are subject to regulatory enforcement.

3.0 Education of Naturopathic Physicians

Seven accredited naturopathic medical schools operate in North America. All programs are accredited by regional accrediting agencies as well as by a programmatic accrediting agency (the Council for Naturopathic Medical Education) recognized by the US Department of Education.

The Doctor of Naturopathic Medicine (ND) degree is a doctoral level, four-year academic and clinical program. Candidates for naturopathic medical school have a Bachelor’s degree with prerequisites in biology, chemistry, physics and psychology.

The program is residential and includes a minimum of 4100 clock hours, 1200 of which must be clinical training in direct patient care under the supervision of licensed NDs and other health professionals. Didactic clinical sciences courses complement direct patient care clinical shifts. Most students complete the program in 4 years; however, there are extended program tracks for those who need or wish to take 5 or 6 years to complete the program.

The first two years of the ND program are composed of basic biomedical science courses such as anatomy (including cadaver dissection), biochemistry, physiology, pathology, immunology, etc. Clinical diagnosis courses such as interviewing, physical examination, laboratory and other diagnostic testing, and medical record documentation are also incorporated into the first two years of the program. The third and fourth years are a combination of clinical education and training in the various aspects of clinical medicine such as cardiology, rheumatology, gastroenterology, reproductive medicine, etc.

Outpatient evaluation and management of commonly seen conditions and prevention and health promotion strategies are taught in the classroom, and students work in primary care outpatient clinics directly with patients. Naturopathic clinical principles and philosophy are taught throughout the program and naturopathic treatments (including diet, nutrition, botanical medicine, behavioral medicine, prevention and more) are taught alongside conventional approaches to health and disease. Training in consultation, co-management and referral with other health professionals is a standard part of the curriculum.
A national licensing examination is required for all NDs who wish to practice in a licensed jurisdiction. The Naturopathic Physicians Licensing Examination (NPLEX) is administered in two stages: Part 1 tests basic bio-medical science knowledge and is usually taken after the second year of the program; Part 2 tests clinical knowledge and is taken after the ND degree has been earned.

Residencies are not required for practice except in the state of Utah. Optional residencies are provided for those graduates who are interested, qualified and accepted. There are approximately 115 residency openings annually and about 500 ND graduates annually.

Continuing Medical Education (CME) is required for all licensed NDs. The number of hours required varies by state or jurisdiction, but generally ranges from 20 to 50 hours of CME annually.

More information can be obtained at the following sites: the Association of Accredited Naturopathic Medical Colleges (www.aanmc.org) and the Council on Naturopathic Medical Education (www.cnme.org).

4.0  Practice Status of Naturopathic Physicians in the United States

Naturopathic doctors (NDs) are currently licensed in 20 States and Territories. Approximately 30% of Americans live in a locale that permits access to safe, effective, and affordable natural medicine and treatments provided by licensed NDs who have graduated from an accredited four-year residential naturopathic medical school. Graduates in all states must also pass the Naturopathic Physicians Licensing Examination Board (NPLEX) examination before they can be licensed.

Most naturopathic physicians provide primary care services in outpatient clinics and community health centers. A smaller percentage provides specialty care in outpatient clinics and hospitals, while an even smaller percentage serve in academics, research, and institutional administration.

The patients of naturopathic physicians, as with the patients of MDs and DOs, are eligible for third party reimbursement, as mandated through various state and federal regulations. In select states, naturopathic physicians also participate in Medicaid, and patient centered medical homes. However, to date, veterans have been excluded from receiving physician services from an ND since an employment code has yet to be assigned.

5.0  Independent Survey Documenting Veterans’ Desire for Access to Naturopathic Physicians

A survey of a representative sample of America’s veterans (Appendix D) was conducted in March 2015 by the national survey firm Infosurv for AANP. The survey, which has an error range of +/- 4.9%, revealed the following:
Nearly two-thirds of veterans (64%) would prefer a doctor who prescribes natural therapies before considering drugs or surgery.

Nearly three-quarters of veterans (73%) would consider seeing a naturopathic physician if he or she were on staff at a nearby VHA facility.

Younger veterans (50 years of age and below) are most likely (86%) to say they would consider seeing a naturopathic physician. This is significant because younger veterans, demographically, are the future ‘stakeholders’ of the VA. 69% of those age 51 and above would consider seeing an ND.

Additionally, the survey found that 12% of respondents are located more than 50 miles from a VHA medical facility. These veterans could benefit from access to an ND in private practice closer to home.

6.0  Congressional Call to Include Naturopathic Physicians in the VHA

Members of Congress have expressed interest in naturopathic physicians becoming credentialed to work with veterans in the VA system. In August 2015, Senator Barbara Mikulski (D-MD) wrote to VA Secretary Robert McDonald to request that he explore this matter. Given that the approach taken by naturopathic doctors (NDs) “often has the effect of reducing or eliminating the need for drugs or surgery.... I would like to know what the VHA’s next steps are to incorporate NDs into the VHA,” the Senator wrote. (Sen. Mikulski’s letter is included in this presentation as Appendix A.)

Two months later, in October 2015, 19 members of the US House of Representatives also wrote to Secretary McDonald, urging him to “include licensed NDs, who are trained in the use of safe and effective natural and conventional therapies, in the spectrum of healthcare professionals employed within the agency.” They continued, “After incidences across the country of veterans overdosing on or abusing opioids associated with chronic pain, it is clear we need a new approach to veterans’ pain management...including the services provided by naturopathic physicians.” (The letter from Rep. Pocan and colleagues is included in this presentation as Appendix B.)

The VHA responded in November 2015. David Shulkin, MD, stated: “The philosophy of the ND, emphasizing disease prevention and health promotion, is consistent with VHA’s focus. At the same time, the role that NDs could play within VHA is less clear.” He continued, “If a role for NDs...is properly scoped, the first step in establishing this as an occupation within VHA would be to clearly articulate the role and function that NDs would play within VHA, and how they would interact with the other professions and programs within VHA.” (Dr. Shulkin’s letter is included here as Appendix C.)

This paper answers Dr. Shulkin’s call to clearly articulate the role and function of credentialed naturopathic physicians, as well as their expected interaction with other professions and programs within the VHA.
7.0 **Problems Alleviated and Services Enhanced by Integrating Naturopathic Physicians**

Integrating naturopathic physicians into the VHA would enhance services the VHA currently provides veterans, alleviate deficiencies and barriers to access, and provide a useful bridge for VHA providers. Specifically:

1. Integrating NDs would enhance the VHA’s delivery of “personalized, proactive, and patient-driven care,” as these are the underpinnings of naturopathic medicine’s principles of practice, core competencies in clinical training, and evidence-informed practice.

2. Integrating NDs would improve the degree of pharmacologic expertise within the VHA pertaining to therapeutic diets, dietary supplements, and other many integrative treatment options. NDs are the only physician-level provider proficient in utilizing, selecting among, and efficiently integrating multiple non-pharmacologic options in the treatment of disease. In particular, NDs are trained to understand when these can be applied safely and effectively.

3. Integrating NDs would help to alleviate the current shortage of primary care providers, as NDs are trained to provide primary care services, which they deliver effectively.

4. Integrating NDs would solve an unanticipated barrier to services and care for veterans. Despite non-discrimination of licensed health providers (including naturopathic physicians) being federally mandated through the Affordable Care Act, it only applies to non-veterans. This presents a socioeconomic barrier for veterans who must pay out-of-pocket for naturopathic primary or specialty care services.

5. Finally, because NDs are trained in conventional, complementary, integrative, behavioral, and lifestyle methods, they recognize the value of multiple approaches to care that are efficiently applied in the clinical setting. For this reason, NDs can uniquely serve as invaluable physician bridges between conventional and complementary providers, as well as educators for each on the value of and importance of collaboration.

8.0 **Cost Savings, Disease Prevention, and Improved Health through Naturopathic Medicine**

The VHA stands to realize considerable savings through the use of naturopathic physicians, beginning with the philosophy they hold – namely, that good care should begin with the least invasive approaches to health whenever reasonable. This is made explicit in naturopathic medicine’s “therapeutic order,” which guides NDs’ practice of medicine. The therapeutic order outlines an optimal hierarchy of treatment interventions. It starts with lifestyle changes, social, environmental and inborn determinants, and the removal of factors that impede good health, progressing to the use of natural substances to improve health and treat disease. If a given condition is not amenable to or does not improve with less
invasive, low risk approaches, the therapeutic order proceeds to the use of pharmaceuticals, surgery, or higher risk approaches.

The therapeutic order is individualized to each patient's need for safe, effective care and respect for individual preferences. If patients require pharmaceuticals or surgery as a first line treatment, these approaches are recommended or provided through direct care, co-management, consultation or referral as appropriate.

There are several specific reasons that naturopathic care is cost effective. These include:

**Lower Prescription Drug Utilization:** NDs typically prescribe fewer pharmaceuticals than do conventional MDs, and several studies have found that naturopathic care results in substantially lower prescription drug costs compared to conventional care. For example, in two studies relating to prescription drug use, integrative medicine users reported significantly lower prescription drug use of 48% and 61%, respectively. Another example, a systematic review of randomized clinical trials found that use of natural health products had the potential to reduce costs compared to conventional treatment by up to 73%. And in another trial, patients who received intensive lifestyle modification and naturopathic therapy for type II diabetes over the course of just one year improved all health scores (lipid levels, body fat percentage, etc.) and decreased medication requirements compared to those on standard therapy. A naturopathic physician will, when safe and reasonable, and instead of prescription drugs, recommend dietary changes, nutritional supplements, and other non-drug approaches to effectively address medical problems.

**Cost Savings Attributable to Integrative Methods:** Many studies have examined the cost impact of Complementary and Alternative Medicine (CAM). These studies are excellent predictors of the cost savings resulting from naturopathic care since many CAM methods are by definition consistent with naturopathic medicine. A study of CAM usage (including naturopathic medicine, chiropractic, acupuncture, and massage therapy) in Washington State found that CAM visits accounted for 17.6% of outpatient provider visits, but just 2.9% of total medical expenditures. Per visit, expenditures to integrative medicine providers cost only 52% as much as for conventional outpatient care. Further

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evidence of cost savings comes from a study that found that annual health care expenditures for insured integrative medicine users in Washington State were $356 less than for non-integrative medicine users.\(^8\) The most comprehensive economic analysis of CAM completed to date identified over 300 economic evaluations of CAM services. The highest quality studies consistently found that CAM services were cost-effective or cost-saving compared to conventional care.\(^9\)

**Extensive Use of Cost-Saving Services:** Many of the services provided by NDs are those with the strongest evidence of cost savings. For example, many patients visit NDs for treatment of chronic pain, most commonly back pain. An estimated 31% of visits to NDs are for musculoskeletal problems.\(^10\) Many other visits to NDs are to address cardiovascular disease risk factors, such as hypertension and high cholesterol, as well as to address symptoms of menopause. The use of integrative medicine to treat these conditions has been shown to reduce costs.\(^10,11\)

**Disease Prevention and Improved Health:** Naturopathic care can reduce the risk of disease, resulting in lower future health care costs, and improved health. An internal Blue Shield study in Washington State estimated that a naturopathic-centered managed care program could cut the costs of chronic and stress related illness by up to 40% and lower the costs of specialist utilization by 30%.\(^12\) In another study, patients receiving a single year of care under the supervision of a naturopathic doctor (compared to conventional care) experienced a 3.1% reduction in 10-year CVD event risk, and were 16.9% less likely to develop metabolic syndrome, which resulted in a savings to society of $1,138 per patient.\(^13\) Finally, four studies to date have demonstrated improvements in blood sugar control among patients working with NDs. Additional benefits of the treatment included weight loss, lower blood pressure, and less depression.\(^14\)

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\(^12\) Phase I Final Report: Alternative Healthcare Project. King County Medical Blue Shield. 1995.


In sum, the research supports naturopathic medicine and naturopathic approaches in reducing the use of pharmaceuticals and in cost savings, risk reduction, disease prevention, and improved patient health.

9.0 Potential Placement of Naturopathic Physicians in the VHA

Multiple benefits would accrue from veterans having access to naturopathic physicians. Patients utilizing naturopathic medicine report much higher satisfaction and health improvement, as compared to conventional care alone. The agency’s watchwords – as well as the report of the National Center for Complementary and Integrative Health of NIH, the Department of the Defense, and the VHA – reflect how care should be “personalized, proactive, and patient driven.” And, “instead of focusing on a single complementary healthcare modality, research should focus on an integrated package of non-pharmacologic modalities that could be individualized.” These are not only congruent with the naturopathic philosophy and approach to care, but also supported by whole system research on naturopathic practice.

AANP proposes the following placements for naturopathic physicians in the VHA:

1. **Integrate NDs into the Planned Regional Centers of Innovation and/or the Whole Health Pathway Sites.** This placement would involve NDs serving as first-contact “Integrative Specialists,” enhancing services to veterans to foster behavioral changes through improved nutrition, stress management, and natural, less invasive approaches to health.

2. **Integrate NDs into Inter-professional Program Development in Teams with Other Providers.** Given that NDs are physicians competent in conventional and complementary/integrative techniques, they are uniquely positioned to evaluate when combinations of such techniques are of value and when they are not. This placement would serve the VHA in its efforts to develop programs that are just informed by evidence but also patient-centered, inter-professional, and culturally considerate of the belief system of those veterans preferring to use non-drug approaches when they can be applied safely.

3. **Integrate NDs as Primary Care Providers.** NDs are trained and currently practice in many communities as PCPs, where they are recognized as such by third-party payers, state statutes, state loan repayment programs, and Medicaid. The question has been raised as to whether NDs would be of value in alleviating the VHA’s primary care shortage because of their small number relative to

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conventional physicians. While it is true that the number of NDs is small relative to conventional MDs nationwide (though the ND profession is rapidly growing), given the PCP shortage within VHA – and the willingness and ability of many NDs to integrate into the VHA’s PCP model as reflected in its standards and guidelines – it would seem prudent to allow them to do so.

The opportunities for the VHA with an additional category of physicians trained in both conventional and integrative methods are broad. NDs would offer unique services for veterans individually, and for the VHA overall through direct patient care services, enhancing teaming and program development as physician bridges between conventional and CAM providers. To realize the full potential of these opportunities, AANP proposes that the VHA designate licensed NDs with a physician-level employment code, consistent with NDs’ training and education. NDs would then be available to provide whatever needs individual VHA facilities may have within the ND scope of physician training and practice.

10.0 Expected Outcomes of Naturopathic Physician Placement in the VHA

The nation’s naturopathic physicians are committed to meeting the health needs of America’s veterans, particularly chronic health conditions such as pain, diabetes, cardiovascular disease, anxiety, and depression. There is good reason to project that many veterans would be treated more effectively – and certainly in a more personalized, proactive, and patient-centered manner – with naturopathic care in supporting the conventional treatment they are currently receiving. Based on the content provided herein, as well as other institutional precedents, integration of NDs would produce the following desirable outcomes:

1. Partial alleviation of the shortage of primary care providers at the VHA.
2. Solidifying delivery of the VHA’s “personalized, proactive, and patient-driven care."
3. Addressing the current physician-level gap at VHA for expertise in non-pharmacologic methods.
4. Enhancing communication between conventional and integrative providers, with NDs serving as ambassadors trained in each.
5. Lowering risk and occurrence of drug/herb/supplement interactions and inappropriate patient self-treatments.
6. Improving and sustaining the health of veterans, along with cost savings and veteran satisfaction for chronic conditions such as cardiovascular disease, diabetes, obesity, anxiety and depression; and,
7. Responding to the strong interest expressed through congressional and veteran requests for access to naturopathic services.

11.0 Overcoming Barriers in Utilization of Naturopathic Physicians
Unfortunate biases exist in the prevailing medical system and in the VHA that need to be acknowledged and addressed. One such bias is the belief by some MDs and other conventional providers that the education, training, and practice of naturopathic physicians is somehow inferior to those of conventional physicians. Another is the belief that naturopathic medicine is not evidence-based.

Addressing these biases and barriers through education, referrals, and training in teamwork among professionals will help to optimize the provision of naturopathic medicine services in the VHA. It is often repeated relative to both conventional and integrative healthcare that providers that train together work better together. Grand rounds and tumor boards are accepted models where a variety of qualified providers with differing professional training can contribute expertise to patients’ care plans in a respectful, collegial, and practical manner. The unique philosophy of naturopathic medicine, and the published evidence underpinning it, may warrant specific presentations by NDs to VHA staff to inform and enhance their utilization.

Naturopathic physicians frequently consult with and refer to medical specialists and other providers, and this practice should encourage bi-directional consultations and referrals. Through their integrative training and practice in multiple modalities, naturopathic physicians tend to be very comfortable referring, consulting and co-managing care among diverse conventional and CAM/integrative health professions. This occurs readily because NDs are familiar with the health care disciplines from which these modalities of treatment have been drawn. Integrative healthcare, at its best, is a team approach. The inclusion of naturopathic physicians within the VHA will add to the collegiality necessary for effective teamwork.

12.0 Summary and Recommendations

Many reasons and much evidence supporting the value of adding naturopathic physicians to the VHA have been presented in this paper.

As the VHA faces numerous challenges – among them a shortage of primary care physicians, increasing costs, and a rising number of lifestyle-related chronic diseases including obesity, depression and anxiety – naturopathic physicians can help addresses these issues and shortages by becoming part of the VHA.

Consistent with the goals of effective primary care, naturopathic medicine contributes to improved health and wellness through delivery of quality, patient-centered care that prioritizes prevention of disease and restoration of optimal health using natural, minimally invasive therapies where reasonable.

Growing evidence confirms that integrative approaches generally, and naturopathic care specifically, can lower costs, reduce disease risk, and improve health quality and health outcomes where numerous
chronic conditions are concerned. Accordingly, the VHA and other health care systems continue to expand access to integrative, complementary and naturopathic care through state and federal programs with a culture of patient-centered team care. NDs can bridge professional cultures, providing the VHA with a knowledgeable interface among practices and professions in an increasingly inter-professional environment.

Perhaps the most compelling reason to include NDs is to address the disparity of access for veterans to naturopathic care that is mandated for most of the rest of the US population through the Affordable Care Act and other state and federal statutes. Integrating NDs within the VHA would resolve this inequity facing veterans, and answer the calls by veterans and Members of Congress to do so.

In conclusion, we respectfully recommend that the VHA undertake the following to integrate naturopathic physicians into the VHA at its earliest opportunity:

1. **Include NDs to Serve in the Planned Regional Centers of Innovation and/or the Whole Health Pathway Sites.** This placement involves NDs serving as a first-contact “Integrative Specialists,” enhancing services to veterans to foster behavioral changes through improved nutrition, stress management, and natural, less-invasive approaches to health.

2. **Include NDs in Program Development Teams with Other Providers.** As physicians competent in conventional and complementary/integrative techniques, NDs are uniquely equipped to evaluate when combinations of such techniques are of value, and when they are not. This placement would serve the VHA in its efforts to develop inter-professional and integrative programs and teams that are not only informed by evidence, but also patient-centered and culturally considerate of the belief system of those veterans preferring to use non-drug approaches when they can be applied safely. Venues would be established for inter-professional training in co-management, referral and consultation practices between NDs and other VHA providers.

3. **Integrate NDs into the VHA as Primary Care Providers.** NDs are trained and currently practice in many communities as PCPs, where they are recognized as such by third party-payers, state statutes, state loan repayment programs, and Medicaid. NDs will be valuable in alleviating the VHA’s primary care shortage because of their training, competencies, scope of practice, and the manifest interest of many NDs to integrate into the VHA’s PCP model. It would seem prudent to allow those NDs willing to serve within the standards and guidelines of the VHA primary care model to do so.

4. **Generate a Physician Level Employment Code for NDs to Work at their Full Scope as Physicians for the VHA and to Accomplish the Goals Outlined Above.**

Appendices A & B: Congressional Requests to Integrate Naturopathic Physicians in the VHA
August 7, 2015

Robert McDonald
Secretary
Department of Veterans Affairs
810 Vermont Ave, NW
Washington, DC 20420

Dear Secretary McDonald:

I applaud the Veterans Health Administration for its progress in providing integrative healthcare to veterans. These kinds of steps are essential for meeting the comprehensive medical needs of our veterans.

Another important step to comprehensive care for our veterans is for the VHA to include licensed naturopathic doctors (NDs) in the spectrum of healthcare professionals employed within the agency. Licensed NDs are trained in the use of safe and effective natural therapies, in addition to conventional therapies, in order to help patients maintain good health and to treat health problems. These professionals have attended federally accredited post-graduate naturopathic medical school and have passed national licensing exams. Their training emphasizes illness prevention, proactive self-care (such as nutrition and stress reduction), and chronic disease treatment aimed at helping the body heal itself. This approach often has the effect of reducing or eliminating the need for drugs or surgery. Given the difficulties many veterans face from taking multiple prescription drugs—such as opioids for chronic pain—it seems appropriate for the VHA to bring licensed NDs into the system.

In order for this to happen, an employment code would need to be assigned. My understanding is that the General Health Science Series, GS 601, covers the types of services provided by NDs. This employment code covers work that is specifically health-oriented in character and is either of such generalized or miscellaneous specialized nature that it is not more readily classifiable in any other series.

I hope that you will look into this issue and I would like to know what the VHAs next steps are to incorporate NDs into the VHA in order to provide superior healthcare to Maryland veterans and veterans across the nation.

Sincerely,

Barbara A. Mikulski
United States Senator
The Honorable Robert McDonald  
Secretary  
US Department of Veterans Affairs  
810 Vermont Ave NW  
Washington, D.C. 20420  

Dear Secretary McDonald:  

We appreciate the progress the Veterans Health Administration (VHA) has made in providing integrative health care to veterans, especially for those living with chronic conditions. These steps are essential for reaching the agency’s goals of personalized, proactive, and patient-driven care for America’s veterans. As the VHA continues to implement a collaborative treatment approach for chronic pain, we urge you to include licensed naturopathic doctors (NDs), who are trained in the use of safe and effective natural and conventional therapies, in the spectrum of healthcare professionals employed within the agency.  

Licensed NDs attend a 4-year, federally accredited post-graduate naturopathic medical school and have passed national licensing exams. Their training emphasizes illness prevention, proactive self-care such as nutrition and stress reduction, and chronic disease treatment aimed at helping the body heal itself. This approach often has the effect of reducing or eliminating the need for drugs or surgery. Given the difficulties many veterans face from taking multiple prescription drugs – such as opioids for chronic pain – the VHA and its patients will greatly benefit by bringing licensed NDs into the system.  

As you know, in order for the VHA to bring NDs into the system an appropriate employment code must be assigned. Our understanding is the Department of Veterans Affairs has the authority to assign a new code, giving veterans the opportunity to be treated by a ND.  

After incidences across the country of veteran’s overdosin on or abusing opioids associated with chronic pain, it is clear we need a new approach to veterans’ pain management. Our veterans deserve accessibility to all possible forms of care when making their health care decisions, including the services provided by naturopathic physicians. Without an employee code, we are robbing our veterans of access to physicians with expertise in natural therapies without the risk of addiction or overdose.
Making integrative health care available for America’s veterans is a clear and present need. We urge the Department to assign licensed naturopathic physicians an appropriate employment code so they can treat our veterans. If you have any questions please reach out to our office at 202-225-2906. We look forward to your response and continued work improving veteran’s health care.

Sincerely,

Mark Pocan  
Member of Congress

Suzan DelBene  
Member of Congress

Earl Blumenauer  
Member of Congress

Walter B. Jones  
Member of Congress

Raúl M. Grijalva  
Member of Congress

Ann Kirkpatrick  
Member of Congress

Julia Brownley  
Member of Congress

Betty McCollum  
Member of Congress

James P. McGovern  
Member of Congress

Kyrsten Sinema  
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Elizabeth H. Esty  
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Peter DeFazio  
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Peter J. Visclosky  
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Derek Kilmer  
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Pedro Pierluisi  
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Gregory W. Meeks  
Member of Congress

cc: The Honorable David J. Shulkin, MD  
Under Secretary for Health  
Veterans Health Administration  
810 Vermont Ave NW  
Washington, D.C. 20420
DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON DC 20420

November 5, 2015

The Honorable Mark Pocan
U.S. House of Representatives
Washington, DC 20515

Dear Congressman Pocan:

Thank you for your October 14, 2015, co-signed letter to the Department of Veterans Affairs (VA) regarding the incorporation of naturopathic doctors (ND) into the Veterans Health Administration (VHA) health care system. I am responding on behalf of the Department.

VHA is committed to improving the health and well-being of our Nation’s Veterans. While much work has been done to help prevent disease and improve chronic disease management, empowering Veterans to improve their health will be key to VHA being able to achieve this goal. Many chronic diseases may be prevented or their effects greatly mitigated by lifestyle interventions, and many of these diseases cannot be adequately managed solely with medications and medical interventions. VHA continues to explore new ways to emphasize health promotion and disease prevention. This includes exploring which complementary and integrative health practices show promise in promoting, preserving, and restoring the health and well-being of Veterans.

The philosophy of the ND, emphasizing disease prevention and health promotion, is consistent with VHA’s focus. At the same time, the role that NDs could play within VHA is less clear. The relatively small numbers of some 5,000 NDs within the United States, compared to an estimated 209,000 primary care providers, raises the question of whether NDs would add substantially to existing roles within VHA or if they would represent an altogether new role in VHA care. While NDs do undergo a standardized educational program, certification, and licensure, they are currently only licensed in 17 states, the District of Columbia, and the U.S. territories of Puerto Rico and the U.S. Virgin Islands. In addition, some of the natural therapies, such as herbal preparations, which are used by NDs, are not permitted within VA.

VHA is evaluating several Complementary and Integrative Health Provider classes as potential new occupations. The identification of a new occupation is complex. It involves several program offices (e.g., Human Resources, Academic Affiliations, Patient Care Services, Quality, Safety & Value, and Regulatory Affairs) and involves multiple factors for consideration (e.g., education and training, scope of practice, licensure and certification, etc.), including working with other Federal partners such as the U.S. Food and Drug Administration.
The Honorable Mark Pocan

Physicians from VHA's Integrative Health Coordinating Center, within the Office of Patient Centered Care and Cultural Transformation, recently met with staff at Bastyr University School of Naturopathic Medicine. This meeting was quite productive, and there are plans for continued dialogue. If a role for NDs in VHA is properly scoped, the first step in establishing this as an occupation within VHA would be to clearly articulate the role and function that NDs would play within VHA, and how they would interact with the other professions and programs within VHA. Once these relationships are identified, then the necessary steps could be taken to create or match NDs to an appropriate occupational class.

We appreciate your interest in the care VHA is providing to our Nation's Veterans and your suggestions on how VHA can improve their health and well-being. Should you have any further questions, please have a member of your staff contact Mr. Tony Adams, Congressional Relations Officer, at (202) 461-6473 or by email at Tony.Adams@va.gov. Similar letters have been sent to the other co-signers of your letter.

Thank you for your continued support of our mission.

Sincerely,

David J. Shulkin, M.D.
Under Secretary for Health
INTRODUCTION

Licensed naturopathic physicians are not currently credentialed to work within the Veterans Health Administration (VHA). There is good reason to believe that America’s veterans – especially those beset by chronic illness – would benefit from treatment by naturopathic physicians. Illnesses that naturopathic doctors (NDs) are expert in treating include chronic pain, diabetes, cardiovascular disease, anxiety, and depression.

The American Association of Naturopathic physicians (AANP) sought to assess the interest of veterans in having access to naturopathic physicians. AANP contracted with Infosurv to determine the extent to which veterans would seek care from NDs if naturopathic physicians were included in the VHA system.

METHODOLOGY

Infosurv conducted an online survey of 401 individuals in the spring of 2015. The sample consisted of persons who served in a branch of the military, were honorably discharged, and visit a VHA facility for medical reasons. The survey provides an error range of +/- 4.9% at the 95% confidence level for the sample. Respondents were randomly identified from a bona fide online survey sampling panel. The survey was administered blindly, without any identification of AANP as the survey’s sponsor.

SURVEY SAMPLE

Of the respondents, 80% were male and 20% female. Their average age was 40.

49 states are represented among in this sample.

Close to two-thirds (64%) of respondents rated their health as good, one-third (33%) rated their health as fair, and 3% rated their health as poor.

More than three-quarters (77%) of respondents are taking prescription drugs.

62% have visited a VA healthcare facility at least once.

Of those who have visited a VA healthcare facility, 60% live within 20 miles of that facility, 28% live within 21-50 miles of the facility, and 12% live more than 50 miles away.
RESULTS

Veterans Prefer Natural Therapies over Drugs or Surgery

Nearly two-thirds of veterans (64%) would prefer to see a doctor who prescribes natural therapies before considering drugs or surgery. This finding is not surprising as patients generally can be expected to express reluctance to rely on drugs or surgery as the first avenue to address their health challenges.

Most Veterans Would Consider Seeing a Naturopathic Physician

Nearly three-quarters of veterans (73%) would consider seeing a naturopathic physician if that professional were on staff at a nearby VA facility. This finding appears to reflect veterans’ interest in doctors who emphasize noninvasive, natural therapies, and who spend more time with their patients than conventional doctors.

Younger Veterans Are More Likely to Want to See a Naturopathic Physician

Younger veterans (50 years of age and below) are the most likely to say they would consider seeing a naturopathic physician. This is significant because younger veterans, demographically, are the future ‘stakeholders’ of the VA. The trend is stronger the younger the veterans surveyed.

Additionally, the survey found that 12% of respondents are located more than 50 miles from a VHA medical facility. These veterans would undoubtedly benefit from being able to visit a naturopathic physician in private practice located closer to where they live.
ABOUT NATUROPATHIC MEDICINE

According to the AANP, naturopathic medicine is a distinct primary health care profession, emphasizing prevention, treatment, and optimal health. Naturopathic physicians use therapeutic methods and substances that encourage the individual’s inherent self-healing process. Naturopathic practice includes such diagnostic and therapeutic modalities as: clinical and laboratory diagnostic testing; nutritional medicine; botanical medicine; naturopathic manipulative therapy; immunizations; patient counseling; minor surgery; homeopathy; acupuncture; prescription medication; intravenous and injection therapy; and naturopathic obstetrics (natural childbirth).

Licensed naturopathic physicians attend four-year, naturopathic medical schools that derive their accreditation from the U.S. Department of Education. They are educated in the same basic sciences as MDs. They also study holistic and nontoxic approaches to preventing disease, optimizing wellness, and treating disease. To become licensed, a naturopathic physician must take a rigorous professional licensing exam. Naturopathic physicians are currently licensed in 20 States and Territories.

ABOUT INFOSURV

Founded in 1998, Infosurv is a leading market research firm with offices in Atlanta, GA and Denver, CO. Infosurv is committed to delivering insightful survey research to our clients. Infosurv has now served over 350 unique clients ranging from Fortune 50 companies to small non-profits.

Infosurv takes great care in protecting the confidentiality of online respondents, adhering to the strict survey standards of the Council of American Survey Research Associations (http://www.casro.org/?page=thecasrocode). Using a unique Personal Access Code (PAC) system, Infosurv can virtually guarantee against duplicate or unauthorized responses, while maintaining 100% respondent anonymity. Infosurv assigns a PAC to each online respondent, and the PAC is embedded in the survey link e-mailed to the respondent.

For more information, please visit www.infosurv.com.