



In Favor of SB &&2

March 31, 2021

Chair Patterson and Members of the Senate Health Care Committee:

Naturopathic physicians (NDs) have been licensed and practicing in Oregon since 1927. Under the watchful eye of an independent licensing board the profession has been held accountable while maintaining an excellent patient safety record.

Naturopathic medical practice in 2021 is modern, science and evidence based. ND education produces doctors trained to provide primary care upon graduation and licensure.

Persons who earn the ability to be licensed as an ND in Oregon make significant investments in time, money, blood, sweat and tears to learn medicine. The financial cost of medical education is high for NDs pursuing a four year didactic and clinical program. Costing ~90% what an MD/DO needs to spend to accomplish their medical degrees.

Naturopathic physicians provide meaningful choice to the citizens of Oregon for how they address their health and medical issues. Naturopathic medicine brings unique values to modern medicine. NDs are the contemporary experts in the medicinal use of plants, nutrients and lifestyle modifications — in addition to prescribing pharmaceuticals. ND pharmaceutical scope of practice covers everything regularly used in primary care including controlled substances that require a DEA license to judiciously prescribe.

A core value of ND practice is a deep commitment to patient centered health care.

NDs make up about 8% of Oregon's primary care workforce. Our state faces an ongoing and worsening primary care shortage. Oregon needs all properly trained and licensed health care providers to be practicing at the top of their scope, and financially sustainable. This includes NDs.



Oregon Health Science University has NDs teaching, conducting research, and providing patient care. One ND is even a tenured OHSU professor.

NDs are employed by Zoom+Care in what was a pioneering move. Zoom utilizes all available health care workforce properly trained and with a scope of practice satisfying the requirements for front line healthcare. At Zoom+Care NDs practice side by side with MDs, DOs, NPs, and PAs.

In Oregon NDs also work alongside conventional providers at county health departments, FQHCs, and other clinics providing care for under served communities.

MD owned and operated integrated medicine clinics around the state also have NDs on their provider staff.

These employed workforce utilizations of NDs are much fewer than if there were no insurer reimbursement discrimination. Few employers can afford to keep an employee when for arbitrary reasons they produce half the income after providing the same work, expertise, and billing for the exact same health care service.

In Oregon there are 5 provider types with training and scope of practice for general primary care: MDs, DOs, NDs, NPs, and PAs. Four of these provider types are reimbursed for their services by health insurance plans at the prevailing rates.

Only naturopathic physicians are selected to be paid on average 50-60% of those prevailing rates. HealthNet shamelessly pays NDs as little as 20% the rate they pay every other provider type for the exact same medical service.

“Prevailing rates” is the term I’ve used because there are no competing market forces determining what is paid to NDs. Health insurance companies have all the economic power locked up on the purchasing side for their 100s of 1000s of subscribers. A market condition economists call “monopsony.” Monopsony is the market condition when a buyer has cornered the market and can dictate prices and other terms to those who sell. Insurer contracts with NDs are adhesive, adverse and presented as “take it or leave it.” The financial discrimination against NDs is not based on any objective quality or performance measurements that have ever been revealed or disclosed.



NDs cannot count on good faith from health insurers. This has been proven to us. Insurers refuse to bargain, refuse to even talk with us about the payment differential forced upon NDs. By the example of nurse practitioners and physician assistants — a law requiring fair payment by insurers is the only way for a minority profession to escape this systematic discrimination.

Pay discrimination of NDs by health insurers appears to be motivated by some kind of xenophobia. We cannot rule out ideological hegemony as the prime motivation. The evidence from our respectful interactions with insurer representatives indicate a strong institutional bias against NDs that is not objectively supported.

It is not a sincere claim that paying NDs the same prevailing rates as is paid to NPs, PAs, MDs and DOs is a health plan budget buster. The suppressive pressure from these discriminatory reimbursement rates has only served to keep ND practices hanging by a financial thread and few in number.

Should all NDs be forced out of practice, and 2020 did a lot of damage — the very same insurance plan patient-subscribers will still be there, still needing care. Oregonians will have lost access and important choice in health care. ALL of the provider services remaining available to those subscribers would then be paid by the insurers at the prevailing rates, just not to NDs.

We have learned that the incremental cost of paying NDs at parity is ~0.1% of the annual plan budgets. This incremental cost to pay Oregon licensed NDs at prevailing rates for services is well within the rounding errors of the rounding errors of all health plan budgets. SB 772 does not lock in the fee for service payment model. The door for value based payments and other reforms remains unimpeded by the law this bill creates.

Most naturopathic physicians start into this career choice with a head and heart full of idealism. None expects to get rich by it. We just want to help people maximize their health. In return NDs hope to make a fair living based on the talent and investment in learning and training required to become a competent, independent practicing health care provider. All too often NDs leave the profession when they find they are unable to care for themselves financially — because of the insurer reimbursement discrimination this bill aims to remedy.



Oregon deserves to have all of its NDs integrated and normalized as a respected, incremental component of the state's front line, primary care workforce. Oregonians deserve to access the provider type of their choice. NDs deserve to make a proper income and to be financially sustainable as they continue to serve our communities to maximize health one individual at a time.

Please Vote Yes on SB 772

Jeff Clark, ND, Legislative Chair
Oregon Association of Naturopathic Physicians