



February 11, 2021

Dear Joint Committee On Ways and Means Subcommittee On Education;

My name is Stephanie Culver, ND. I live and practice naturopathic medicine in Washington County. I've been licensed by the state of Oregon since 2014.

As my profession continues to struggle for equitable treatment from health insurers and other barriers for proper inclusion with the rest of the primary provider types, **now is not the time to bury naturopathic providers under multiple layers of management inside the Oregon Health Authority.**

The amount of time and effort required to complete this transition **looks to me to be enormous, ineffective, and EXPENSIVE.** My profession can't help but perceive risk from this move given the history of what the profession has endured all these years since the first license was issued.

The state is looking for some small gain in financial efficiency from this consolidation. Whatever that amount is cannot compare to the risks and uncertainties from pushing our licensing board down under that many layers of management. **As it stands, regulation of naturopathic medicine via our current Board and staff is highly efficient and comparatively to other medical professions, fiscally responsible. Adding MORE regulation will delay actions such as legislation, regulation, and investigations.** We have a staff of three people before anything reaches our board for discussion. What is recommended will add several more steps and layers (in other words, more people = more time = more money!). It doesn't make fiscal sense.

My colleagues and I would rather pay higher licensing fees in order to keep our licensing board independent and without further supervision by those unfamiliar with naturopathic medicine, limiting unnecessary and hazardous layers of management. We've fought long and hard to get our profession to its highest and most regulated caliber in the country. **More government regulation under OHA would roll our progress dangerously backwards.** This is important to my profession in order to maintain naturopathic primary care medicine as a real and viable healthcare choice for Oregonians.

Sincerely,

Stephanie Culver, ND
Northwest Integrative Medicine
Chief Medical Officer, Attending Physician