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March 23, 2023

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

Re: Please Oppose SB 408

Senate Bill 408 directs the Oregon Health Authority to establish a process to receive and review health care profession scope of practice requests and impact statements.

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.

I am 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 profession's scope of practice and, if successful, would directly and negatively impact patient care and access to care across the state.

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 number of requests that the OHA can reasonably work through in the biennium.

Please vote NO on SB 408.

Sincerely,

A handwritten signature in black ink that reads "Eliot W. Edwards, ND, FABNO". The signature is written in a cursive, flowing style.

Eliot W. Edwards, ND, FABNO
Naturopathic Physician