



February 19, 2025

Chair Nosse, Vice Chairs Javadi, Nelson and Members of the Committee,

The Osteopathic Physicians and Surgeons is well-aware of the many challenges that providers face in Oregon regarding adequate reimbursement for the care they provide. OPSO fully supports policies that strengthen Oregon's healthcare workforce and provide robust reimbursement for healthcare providers serving Oregon patients; however, we regrettably must oppose HB 3439.

It appears that the issue this bill is trying to correct is inadequate reimbursement to naturopathic physicians (NDs). OPSO fully supports strengthening reimbursement for quality care. HB 3439 however, does not address inadequate reimbursement, but rather addresses reimbursement differences between MD & DO physicians and naturopathic physicians.

HB 3439 would mandate that distinctly different providers with vastly different requirements for licensure, postgraduate training, board certification, hospital affiliations, malpractice costs and accreditation be tied together to the same payment scheme. OPSO has tremendous respect for naturopathic colleagues. We agree that patient choice is critical and naturopathic physicians along with all health care providers should be reimbursed fairly for their work. However, OPSO opposes tying distinctly different licensed health care professionals to the same payment scheme. The distinct postgraduate training and board certification requirements that DOs and MDs complete matter.

Currently, physicians are not paid equally based on a number of factors. Larger clinics often have negotiated contracts for higher reimbursement than those in private practice. Specialists who have additional postgraduate training and skills are paid at a higher rate for the same CPT billing codes as primary care providers are. Also, reimbursement rates are often determined by geographic regions and cost of living.

It is reasonable to expect that reimbursement is commensurate with training. The service provided by a physician is not simply a commodity service, but it is impacted by the training and skill level of the individual providing the service. One example is that a DO or MD primary care physician may bill for an office visit (CPT Code 99214 for evaluation and management) for a moderate complexity patient visit or approximately 20-30 minute appointment and may be reimbursed lower than a specialist billing the same 99214 service. A naturopathic physician billing the same 99214 code would be reimbursed at a different rate which takes into account the provider's training.

Again, please note we are not opposed to strengthening payments for primary care providers including naturopathic physicians. We agree that primary care reimbursement must be strengthened to ensure a strong primary care workforce and provide patient-centered preventive care to all Oregonians. Rather than tying reimbursement rates together, OPSO's proposed solution would be to increase all rates for all providers in primary care including NDs, DOs and MDs. While OPSO opposes binding reimbursement for these different provider types together, we remain in full support of strengthening reimbursement for healthcare providers, specifically for those in underserved communities, rural areas, and in primary care, and remain fully committed and willing to support these efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Walls", written in a cursive style.

David Walls  
Executive Director – Osteopathic Physicians and Surgeons of Oregon