



To: Senate Public Health and Welfare Committee

From: Vicki Whitaker, Executive Director

Date: March 9, 2022

Subj: SB 274 and SB 275 - Expanded scope of Naturopathic doctors and authorizing corporate practice of medicine.

The Kansas Association of Osteopathic Medicine appreciates being able to offer written-only testimony in opposition to SB 274 and SB 275. These two bills would expand the procedures a naturopathic doctor (ND) could perform and provides NDs the ability to engage in the corporate practice of medicine.

NDs' training is not equivalent to that of osteopathic or allopathic medical training. NDs course of study is aimed toward an individual's ability to self-heal. Their prescribing authority is limited to naturopathic products. NDs are not physicians, and their training does not compare meaningfully to that of physicians. Because they are not physicians they do not oversee or delegate acts to other health care providers. Their education does not entitle them to the prescribing of prescriptions or controlled substances, interpreting diagnostic testing or performing obstetrical care or invasive procedures.

SB 274 authorizes changes to existing law that would allow the use of a speculum which is used in vaginal exams which an invasive procedure. It allows the prescribing of prescription-only drugs and controlled substances – anabolic steroid testosterone, injecting drugs into joints such as shoulders and knees and the use of or injection of local or regional anesthetics. It also authorizes "treatments taught in any approved medical college that are not otherwise prohibited by this act." This broad open-ended wording based on programmatic accreditation of "medical colleges" means if such a "medical school" teaches it – the ND can do it.

SB 274 is very broad and would allow someone trained in an alternative approach to medicine, one based on herbs and holistic healing, to exceed their scope of practice and step over into the practice of medicine which requires many years of study, training, and residency to earn the privilege to prescribe medications including controlled substances, do invasive procedures and examinations on patients, perform surgeries, and admit patients to hospitals. These items are in direct contradiction to the naturopathic doctors stated focus on natural healing.

SB 275 allows naturopaths to engage in the corporate practice of medicine. This means a business could hire a naturopath as an employee. KAOM was opposed to the corporate practice of medicine as it creates a direct conflict of interest for the employer and employee. A physician or other healthcare workers are dedicated to the patients they serve while the employer is focused on the bottom-line.

Adding NDs to the corporate practice of medicine further blurs the line of what is medical care and what is alternative medicine. This also leaves the patient with the possible mistaken assumption that their “doctor” is a physician when the “doctor” is limited in their knowledge and training and cannot diagnose and treat them for any serious medical illness or admit them to a hospital.

For these reasons, KAOM respectfully asks for your opposition to both SB 274 and SB 275.