

Mr. Chair and members of the committee

My name is James Gilchrist and I operate a small naturopathic practice in Parker Colorado. I have come today to express my support of SB25-032.

Last week, the Federation of Naturopathic Medicine Regulatory Authorities (FNMRA) emailed you all a document that expressed their support our bill. My testimony today draws on the data they have collected over the past 14 years relating to disciplinary actions taken against NDs throughout the country.

NDs have been practicing as primary care providers safely for decades across the country. The chart below details cases in 11 of the 26 regulated jurisdictions that allow NDs broad prescriptive authority. You can see that over the past 14 years- 0 disciplinary actions have been taken against NDs in the states where Opioids are excluded from the state formularies, as SB25-032 outlines for Colorado NDs.

Disciplinary Actions Related to Naturopathic Doctor Prescribing

Disciplinary Actions Related to Prescribing from 2010 through 2024*				
Jurisdiction	Disciplinary Actions	Estimated Number of Licensees	Average Disciplinary Actions Per Year	Years since 2010 with Broad Prescribing Rights
Jurisdictions with Broad Prescribing Rights EXCLUDING Opioids				
Hawaii	0	150	0.0	14
Idaho	0	85	0.0	4
New Hampshire	0	75	0.0	14
New Mexico	0	30	0.0	5
Utah	0	90	0.0	16
Jurisdictions with Broad Prescribing Rights INCLUDING Opioids				
Vermont	0	380	0.0	14
Montana	0	155	0.0	14
California	1	1100	0.1	14
Oregon	20	1500	1.4	14
Arizona	20	1600	1.4	14
Washington	33	1600	2.4	14
TOTAL	74	6765		
* Or since year of licensure if established after 2010.				
FNMRA interprets broad prescribing rights as access to all major categories of prescription drugs required for primary care.				

Source: FNMRA Disciplinary Action Tally by Type 2010-Present¹⁰
All categories of disciplinary actions can be seen in Addendum B.

You have heard eyewitness testimony today given by a Pharmacist in Oregon that has filled literally thousands of ND scripts since granting NDs that privilege 14 years ago, that it has been a very safe, successful endeavor in that state.

Both the Colorado Department of Public Health and Environment as well as the Federal Health Resources and Health Services Administration have identified multiple areas in Colorado as Health Professional Shortage Areas. A recent article in the Denver Post

recognized that this shortfall is present even in the city of Denver. While the state has taken measures to address this need, SB25-032 offers an immediate partial remedy to Colorado's problem.

The Pew Health Commission Taskforce on Health Care Workforce Regulation has called to allow all professionals to provide services to the full extent of their current knowledge and training and The Institute of Medicine (IOM) has called for innovation and inclusiveness of all healthcare practitioner types in meeting patient needs.

Today you've heard several examples of how limiting access to independent healthcare providers causes a significant delay in obtaining timely health and wellness services, resulting in negative health outcomes.

I urge each of you to vote yes on SB250-032 to allow NDs to practice to the level of their training, as many of you already have for PAs, Nurse practitioners and Mental Health Providers.