

Electronic Testimony  
HB 6797

Submitted By: **Steve Wiggins, Founder of Oxford Health Plans; Managing Director of Essex Woodlands Health Ventures; Chairman, Remedy Partners.**

I am submitting this written testimony electronically but will be out of state on March 13<sup>th</sup> so am unable to attend the hearing in person.

I have a long history of building and managing large health care organizations and have spent considerable time and resources to understand the training, capabilities and outcomes associated with treatment by Naturopathic Doctors. This long history has afforded me a unique view into their relevance and value in our health care system. I am supportive of full M.D. equivalence in prescribing and all other scope of practice powers for Naturopathic Doctors.

Beginning in the early 1990s, Oxford Health Plans conducted extensive reviews of a wide range of what was termed 'Complimentary and Alternative Medicine' practices. We assembled a team of researchers, including six MD Medical Directors, led by Hassan Rifaat, MD, to evaluate the metadata related to clinical outcomes and the education and training of Chiropractors, Naturopathic Doctors and Acupuncturists. We also studied Ayurveda, Homeopathy and Traditional Chinese Medicine.

This analysis led to the creation of a Complimentary Medicine Rider that, for the first time in the U.S., provided insurance coverage for Chiropractic Care and Acupuncture, along with limited support for select Ayurvedic, Homeopathic and Traditional Chinese Medicine services. The Rider was the most successful new program ever launched by Oxford. Since then, Chiropractic care has become a mandated benefit in most states although other Complimentary Services remain largely funded by patients.

That same analysis concluded that Naturopathic Doctors should be reimbursed the same way Primary Care Physicians are reimbursed, under the base coverage, using the same coding schema and payment rates for billing and reimbursement. We gave them full equivalence from a payment standpoint. Today, they enjoy widespread coverage by most private insurance programs.

Our analysis revealed that the training of Naturopathic Doctors in their first two years of medical school is almost identical to MD training, with a few caveats. They take more science! They have additional courses in botanical medicine and treatment options informed by Traditional Chinese Medicine, Ayurvedic Medicine and other complimentary therapies. (In China, the Traditional Chinese Medicine sector is 36% of all health care spending) During the course of four years of post graduate training, they have significantly more classroom training in biochemistry and genetics than MDs.

Compared to Nurse Practitioners, who now enjoy full prescribing privileges, NDs take almost four times as many credit hours of classroom scientific training and spend almost 3 times as much time in clinical practice during the course of their training. That APRNs would have full prescriptive authority and NDs do not is either a testament to the very small number of NDs in CT or a widespread failure to understand what a ND is trained to do.

We live in an era in which the MAJORITY of patients with known medical conditions take supplements in addition to prescription drugs. NDs are uniquely trained to understand the mechanisms of action of botanical and other supplements and how they interact with prescription pharmaceuticals. We are also in the midst of an avalanche of new insights about the brain and how our neurotransmitters affect our health. We are discovering important links between our genetics and the ways our lifestyle and the environment can trigger our genetic propensity to launch a disease process. NDs are a treasure for each of us to appreciate. They are trained to piece together the puzzle of life and disease in a way that our traditional medical education system has unfortunately failed to fully embrace.

From a practical standpoint, we need more Primary Care. Remedy Partners, based in Darien, has grown to become the largest manager of bundled payment programs in the U.S. Our Medicare contract alone already has default enrollment of a huge swath of Connecticut patients covered by traditional fee for service Medicare. We are measured and rewarded by how successfully we help patients recover from hospitalizations, covering over 178 Medicare DRGs. We engage with the most challenging seniors, who have on average 3 co-morbidities and they become our 'Members' the day they are hospitalized and for 90 days after they are discharged.

We have relied entirely on a team of Naturopathic Doctors to develop our dietary, supplement and exercise protocols. These protocols are reviewed by teams of MDs, led by Wit Whitcomb, MD, the Chief Medical Officer of Remedy. One set of protocols for each disease is aimed at physicians and the other set is aimed at patients. Along with disease specific guidance, the protocols address drug/drug and drug/supplement interactions. We needed NDs to do this because the MDs on our team admitted they were not trained to develop these protocols. The protocol sets, developed here in CT, are now used in over 700 hospitals nationwide. No one seems to mind that the authors are NDs!

Remedy seeks to make more extensive use of NDs in helping these seniors recover, but NDs are unable to fully meet our needs if they are not also able to prescribe the range of drugs outlined in their request for expand scope of practice. The primary care practices take a different, pharma-centric approach than what patients are doing. We want to integrate the best of both worlds, and to do that CT needs to join the growing list of state's recognizing the facts behind the Naturopathic Medicine.

Thank you for the opportunity to submit this written testimony.