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May 12, 2011

RE: AN ACT to amend the education law, the limited liability company law and the partnership law, in relation to the practice of naturopathy; and to amend the social services law, in relation to the reporting of child abuse.

A.1937 (Hoyt)  
S.1803 (LaValle)

**MEMORANDUM IN OPPOSITION**

Submitted on behalf of the Blue Cross and Blue Shield Plans

The New York State Conference of Blue Cross and Blue Shield Plans opposes enactment of this Bill, which would establish criteria for the licensure of naturopaths and thereby create the profession of Naturopathic Medicine. This bill would place the health of New Yorkers at risk by allowing inadequately trained individuals to provide health care treatment without physician oversight.

**1. ALLOWING PATIENTS TO BE TREATED BY NATUROPATHS WITHOUT SUPERVISION FROM PHYSICIANS PLACES PATIENTS AT RISK.**

This bill defines the practice of naturopathy as the use of "education and natural therapies to support and stimulate a patient's intrinsic self-healing process to promote wellness and to prevent, diagnose, treat and prescribe for human health conditions." The sponsor's memo asserts that naturopaths use "standard medical diagnostic techniques and treat disease with natural medicines and therapies." This bill ignores the fact that naturopaths are not trained or able to diagnose diseases which may mask as problems capable of being helped by naturopathy, but which may, in reality, be diseases which need immediate medical treatment. A patient's condition could go unnoticed, be improperly diagnosed, or exacerbated by improper treatment from the naturopath.

Additionally, many of these therapies involve areas that are limited to physicians due to the need for specialized knowledge of anatomy and physiology. This specialized knowledge, combined with a comprehensive understanding of the patient's medical needs, is critical to providing quality care. Naturopaths are not qualified to provide comprehensive primary care and therefore they will serve a narrow purpose and will fragment important continuity of care in the primary care setting, leading to potentially harmful outcomes.

For example, administration of any medicine, natural or pharmaceutical, should be monitored by a physician who is appropriately trained to recognize medicinal interactions or allergic reactions. Specifically, certain herbal supplements, such as St. John's Wort, can have harmful interactions with important prescription medications such as antiretrovirals, underscoring the need to have their use monitored by a medical professional.<sup>1</sup>

This form of episodic or isolated treatment leads to increased costs, potential waste and sacrifices holistic quality of care. Moreover, the thrust of this Bill runs completely counter to efforts to reform the health system through the creation of "medical homes" or "health homes" which provide comprehensive, cost effective treatment through provider collaboration and enhanced quality of care.

2. **THIS BILL WILL INCREASE HEALTH INSURANCE COSTS BECAUSE IT CREATES A NEW SCOPE OF PRACTICE REQUIRING INSURANCE COVERAGE.**

Recognizing the practice of naturopathy as a new medical profession will only contribute to the rising cost of health care while providing little benefit to patients. Any expansion of the scope of practice will likely result in yet another costly mandate. New York State already has over 40 mandates that significantly increase the cost of health insurance premiums by an average of 12%. (Nova Consulting 2005). New York's mandate-rich approach to health insurance presents complicating factors in the face of federal health care reform as policies meeting the State's mandate requirements will likely be significantly different from those required by the health insurance exchange.

Allowing naturopaths to practice medicine without adequate training subjects patients to unnecessary risks and increasing expenses without a discernable benefit. For the foregoing reasons, the New York State Conference of Blue Cross and Blue Shield Plans opposes enactment of this legislation.

Respectfully submitted,

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Legislative Counsel for the Blue Cross and Blue Shield Plans

4812-8810-9577, v. 2

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<sup>1</sup> Source: FDA Public Health Advisory, February 2000.  
<http://www.fda.gov/Safety/MedWatch/SafetyInformation/SafetyAlertsforHumanMedicalProducts/ucm173258.htm>