



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. Box 3378
Honolulu, HI 96801-3378
doh.testimony@doh.hawaii.gov

WRITTEN ONLY

**Testimony COMMENTING on SB 2476
RELATING TO HEALTH**

SENator ROSALYN BAKER, CHAIR
SENATE COMMITTEE ON COMMERCE, CONSUMER PROTECTION, AND HEALTH
Hearing Date: 01/31/2020 Room Number: 229

- 1 **Department Testimony:** The department would like to provide comments on this measure.
- 2 The purpose of this bill is to increase patient access to medical cannabis by authorizing
- 3 naturopathic physicians to provide written certification for medical cannabis use to qualifying
- 4 patients. This measure seeks to amend 329-121, Hawaii Revised Statutes to do so. This
- 5 amendment would be predicated on proposed changes to Chapter 455 Hawaii Revised Statutes to
- 6 permit naturopathic physicians to obtain a controlled substance registration from the Department
- 7 of Public Safety. This registration for naturopathic physicians would be applicable only for the
- 8 certification of patients for medical cannabis.
- 9 The department supports efforts to increase patient access to medical cannabis which is limited
- 10 by the number of physicians and APRNs actively certifying qualified patients, but has concerns
- 11 that a treatable condition or disease process may be missed if the individual's sole provider is a
- 12 naturopathic physician. The Department defers to the Department of Public Safety for
- 13 amendments to Chapter 329, HRS and the Department of Commerce and Consumer Affairs on
- 14 any amendments related to Chapter 455, HRS in the bill.
- 15 Thank you for the opportunity to testify.

**Testimony of the
Board of Naturopathic Medicine**

**Before the
Senate Committee on Commerce, Consumer Protection, and Health
Friday, January 31, 2020
9:30 a.m.
State Capitol, Conference Room 229**

**On the following measure:
S.B. 2476, RELATING TO HEALTH**

Chair Baker and Members of the Committee:

My name is Chris Fernandez, and I am the Executive Officer of the Board of Naturopathic Medicine (Board). The Board offers comments on this bill.

The purpose of this bill is to authorize naturopathic physicians to provide written certification to qualifying patients for medical cannabis use.

The Board will review this bill at its next publicly noticed meeting on January 31, 2020. In the meantime, the Board offers comments based on its testimony on H.B. 673, Relating to Medical Cannabis, from the 2019 legislative session: Certifying patients for the use of medical cannabis falls within the scope of practice and education of a naturopathic physician. However, before certifying patients for medical cannabis use, naturopathic physicians must first be authorized to prescribe controlled substances pursuant to Hawaii Revised Statutes chapter 329 (Uniform Controlled Substances Act).

Thank you for the opportunity to testify on this bill.



Akamai Cannabis Clinic

3615 Harding Ave, Suite 304
Honolulu, HI 96816

**TESTIMONY ON SENATE BILL 2476
RELATING TO HEALTH**

By
Clifton Otto, MD

Senate Committee on Commerce, Consumer Protection, and Health
Senator Rosalyn H. Baker, Chair
Senator Stanley Chang, Vice Chair

Friday, January 31, 2020; 9:30 AM
State Capitol, Conference Room 229

Thank you for the opportunity to provide testimony on this measure. Please consider the following comments related to this bill:

This bill discriminates against those physicians and APRNs in Hawaii who wish to provide Written Certifications without state and federal controlled substance prescribing registration. A similar allowance should be made for such physicians and APRNs if the committee wants to proceed with this measure.

Because the cannabinoids THC and CBD are still controlled substances, and are often used in combination with other controlled substances, the lack of experience that Naturopathic Physicians have with prescribing and managing the medical use of controlled substances should also raise questions about the safety of adding this authority to the scope of naturopathic practice.

Finally, prescribing medical cannabis does not fall within the scope of naturopathic practice because nobody can prescribe medical cannabis until there is an FDA-approved botanical cannabis drug product available in our pharmacies.

Aloha.

SB-2476

Submitted on: 1/30/2020 7:29:47 AM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Miles W. Tuttle	Testifying for Kush Hawaii	Support	No

Comments:

**To: Chair Rosalyn H. Baker
Vice Chair Stanley Chang
Members of the Committee on Commerce, Consumer Protection and Health**

**From: Michael Traub, ND
Legislative Committee Chair
Hawaii Society of Naturopathic Physicians (HSNP)**

**Re: SB2476, Relating to Health
January 31, 2020, at 9:30 am, Conference Room 329**

Position: IN SUPPORT

Current Hawaii law states allows a Hawaii-licensed Medical Doctor, Doctor of Osteopathy, or Advanced Practice Registered Nurse to certify a patient for the Medical Cannabis Program.

The proposed legislation would allow naturopathic physicians to certify a patient for the Medical Cannabis Program by amending the law to authorize naturopathic physicians to obtain a Drug Enforcement Agency (DEA) number and a Hawaii Controlled Substance License.

HSNP supports this bill for the following reasons (with suggested amendments below):

- The fact that medical cannabis is a botanical medicine demands a sophisticated understanding of *Cannabis* species and the variety of preparations in which it is available.
- Naturopathic physicians are experts in botanical medicine and medicinal plant chemistry, safety and efficacy.
- Botanical medicines comprise the bulk of prescriptions made by naturopathic physicians from the naturopathic formulary as determined by the Hawaii Board of Naturopathic Medicine (BNM).
- **In November 2019, in anticipation of successful passage of legislation such as this bill, the BNM removed the prohibition of controlled substances from the naturopathic formulary.**
- **SB2476, in its current form, states on p.2 “that this shall not be construed to authorize any naturopathic physician to manufacture, distribute, prescribe, dispense, or conduct reverse distribution with any controlled substance within this State”**
And on p.9 “the naturopathic formulary shall not include any narcotic drugs or other controlled substances, as defined in section 329-1,” which conflicts with the BNM’s recent decision to remove the prohibition of controlled substances from the naturopathic formulary.
- **We respectfully request that these two sections of HB1797 be deleted, so that no conflict exists between the BNM’s authority with respect to controlled substances.**
- **The BNM, has, for the past 10 years, been clear in its position to not include narcotic drugs in the naturopathic formulary, while at the same time has supported legislation that would allow the inclusion of testosterone (a controlled substance).**
- **The Department of Public Safety has testified in previous sessions of this legislature in favor of adding testosterone to the naturopathic formulary, is supportive of registering naturopathic physicians for controlled substances, and this Committee on CPH has also voted in favor of previous bills in this regard. For some unknown reason/s, however, the bills have not successfully navigated the full committee process for approval by the Legislature.**

- As of January 28, 2020, 278 physicians and APRNs have signed up with the Hawaii Medical Cannabis Program. Of those 278 providers, 173 have filed certificates for medical cannabis. There are 27,000 medical cannabis card carriers. These numbers are evidence that there is a need for greater access to providers who are authorized to certify patients for the Medical Cannabis Program.

- In addition to their expertise in botanical medicine, naturopathic physicians are primary care physicians and manage prescriptions for many of their patients. There are approximately 135 naturopathic physicians with active licenses in Hawaii. Adding naturopathic physicians to the provider types eligible to certify patients for the Hawaii Medical Cannabis program would increase access to healthcare and benefit the people of Hawaii for whom medical cannabis may be a good therapeutic option.

SB-2476

Submitted on: 1/28/2020 2:14:22 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Donald Daughtrey	Testifying for Vitality Natural Medicine clinic	Support	No

Comments:

Naturopaths are actually herbilists trained in all herbs including canabis, and actually are more qualified and better trained than MDs on this issue, it is ridiculous that NDs are not allowed to prescribe this already. Please fix this injustice now.

SB-2476

Submitted on: 1/30/2020 11:25:26 AM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Tai Cheng	Testifying for Aloha Green Holdings Inc.	Support	No

Comments:

SB-2476

Submitted on: 1/29/2020 4:40:04 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Anne Wheelock	Individual	Support	No

Comments:

Honorable Senators Rosalyn Baker, Chair, and Stanley Chang, Vice Chair,

Please support SB2476 relating to health. This bill authorizes naturopathic physicians to provide written certification to qualifying patients for medical cannabis use. This both increases their scope of practice and increases availability of medical cannabis certification providers.

Thank you.

Sincerely,

Anne Wheelock, R.Ph., M.S.

SB-2476

Submitted on: 1/28/2020 6:31:46 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Alex Steelsmith	Individual	Support	No

Comments:

To: Senator Rosalyn H. Baker, Chair, Senator Stanley Chang, Vice Chair, and Members of the Committee on Commerce, Consumer Protection, and Health**From: Alex Steelsmith****Re: SB 2476, Relating to Medical Cannabis
(January 31, 2020, at 9:30 am, Conference Room 229)****Position: SUPPORT**

Dear Senator Rosalyn Baker, Senator Stanley Chang, and Members of the Committee,

I am writing to urge you to support the passage of SB 2476 because it would expand the law to allow Naturopathic Physicians to certify patients for medical cannabis use. Current Hawaii law gives this responsibility to Medical Doctors, Doctors of Osteopathy, and Advanced Practice Registered Nurses, but inexplicably excludes Naturopathic Physicians. It is highly appropriate to amend the law to authorize Naturopathic Physicians to share this responsibility.

As primary care physicians and our most highly qualified experts in botanical medicine, Naturopathic Physicians are especially well equipped to understand the complexities of prescribing medicinal plants safely and effectively. During their federally-accredited medical training, they complete an average of 130 classroom hours of botanical medicine education through several years of scientific study. Because of this, the training of Naturopathic Physicians in the U.S. is widely considered the world's best medical education in this area of medicine. This is why many other states already authorize Naturopathic Physicians to prescribe cannabis and certify patients for medicinal cannabis.

Expanding our law on this issue to include Naturopathic Physicians will increase access to health care and benefit the people of Hawaii for whom medical cannabis may be an appropriate therapeutic option.

Thank you,
Alex Steelsmith

SB-2476

Submitted on: 1/29/2020 8:48:11 AM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Carrie Brennan, N.D.	Individual	Support	No

Comments:

SB-2476

Submitted on: 1/28/2020 4:49:49 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Darrow Hand	Individual	Support	No

Comments:

Strong support. Please pass SB 2476 as is.

SB-2476

Submitted on: 1/28/2020 3:45:46 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Dave Kisor	Individual	Support	No

Comments:

I see no reason why NDs (Naturopathic Doctors) shouldn't be able to Certify for Medical Cannabis. After all, they go through the same training as your basic Mk1, mod 0, standard issue MD. They work with natural medicine, which is something the drug pushers don't like, because they don't own nature. They just want to imitate it for trademark purposes. If you see an ND like I do, you shouldn't have to see an MD for a certification.

SB-2476

Submitted on: 1/29/2020 7:33:56 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Deborah Davis	Individual	Support	No

Comments:

SB-2476

Submitted on: 1/28/2020 2:32:19 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Bryce Healy	Testifying for Dr. Bryce Healy	Support	No

Comments:

Position: STRONG SUPPORT

Current Hawaii law states allows a Hawaii-licensed Medical Doctor, Doctor of Osteopathy, or Advanced Practice Registered Nurse to certify a patient for the Medical Cannabis Program.

The proposed legislation would allow Naturopathic Physicians to certify a patient for the Medical Cannabis Program by amending the law to authorize Naturopathic Physicians to obtain a Drug Enforcement Agency (DEA) number and a Hawaii Controlled Substance License.

How and Why do Naturopathic Doctors Use Botanical Medicine?[\[1\]](#)

Botanical medicine, also known as herbal medicine, is the science and practice of using medicinal plants and extracts to improve overall health, support wellness, and treat acute and chronic disease. Many conventional pharmaceutical drugs are derived from plants. Modern botanical medicine combines evidence-based science along with centuries-old experience to provide safe and effective treatments that support the body's ability to heal.

Botanical medicines are complex substances that differ in many ways from pharmaceutical drugs. There may be multiple active constituents, some that may have potential for dose-dependent toxicity. Botanical medicine may be contaminated in the growing or harvesting or manufacturing processes. They may be adulterated.

They may interact with prescription drugs in positive or negative ways.

Naturopathic physicians are experts in botanical medicine and understand these complexities and how to use medicinal plants safely.

Cannabis is a perfect example of a complex plant that requires a different understanding than that required for a pharmaceutical cannabis-derived drug. In many other states, naturopathic physicians are authorized to prescribe cannabis and certify patients for medicinal cannabis. This authority comes with the responsibility of knowing what conditions may benefit from cannabis products, as well as conditions for which cannabis may be of no use.

Botanical medicine expands treatment options for patients. Alone or in combination with other naturopathic treatments, botanical medicines can be a safe, appropriate, and effective choice for addressing numerous health concerns ranging from frequent illness to gastrointestinal discomfort to depression, and more. During medical school, NDs complete an average of 130 classroom hours of botanical medicine education.

A cornerstone of naturopathic medicine, botanical medicine is one of the most effective therapies that licensed naturopathic doctors (NDs) use to gently and safely treat illness while minimizing the risk of harmful side effects

Botanical medicine is taught in a series of courses that build upon each other through an ND's four-year, science-based medical education. Naturopathic medical schools are accredited and are recognized by the United States Department of Education. In addition to classroom study, naturopathic medical students refine and apply learnings in various settings, including over 1,200 hours of clinical rotations with patients.

Naturopathic Botanical Medicine Curriculum

Through this rigorous curriculum, naturopathic doctors learn how to choose and effectively prescribe herbal medicines to treat the underlying cause(s) of illness,

minimize side effects and drug interactions, and individualize doses and formulations for the maximum therapeutic benefit. Core areas of focus in naturopathic botanical medicine curriculum include:

- History and current use of Western herbal medicine
- Herbal properties and actions of plants
- Herbal constituents (compounds that have medicinal properties), medicinal actions (function in the body), and indications
- Critical evaluation of literature and research in regard to both efficacy and interactions/contraindications of botanical medicines
- Optimal extraction and delivery for a variety of plants
- Botanical prescription writing
 - Organ systems-based botanical medicine formulation and topical application, including gastrointestinal, respiratory, immune, cardiovascular, ears/eyes/nose/throat, reproductive, urinary, endocrine, musculoskeletal, and nervous systems
- Choosing, assessing and preparing herbal medicine in various forms including aqueous extracts, tinctures, herbal oils and salves, syrups, capsules, oxymels, poultices, and compresses. This includes evaluating comparable advantages and disadvantages of each type of preparation
- Dose ranges, contraindications, toxicity, side effects, and interactions
- Sustainability of herbal medications
- Effective creation of individualized formulas for patients
- Translation of labels to determine the purpose and application of over-the-counter herbal products

This comprehensive training combined with a focus on treating the whole person—mind, body, and spirit—enables naturopathic doctors to utilize botanical medicine when best suited to effectively treat the patient based on their diagnosis and presentation. By spending extra time to evaluate and diagnose patients and then drawing on a spectrum of therapies including botanical medicine, clinical nutrition, and behavioral and lifestyle medicine, naturopathic doctors tailor comprehensive treatment to each patient, with a close eye on safety.

In addition to being experts in botanical medicine, naturopathic physicians are primary physicians and manage prescriptions for many of their patients. Adding naturopathic physicians to the provider types eligible to certify patients for the Hawaii Medical Cannabis program would increase access to healthcare and benefit the people of Hawaii for whom medical cannabis may be a good therapeutic option.

[1] Patricia Gaines, ND, and Sheila Kingsbury, ND, *How and Why do Naturopathic Doctors Use Botanical Medicine?* (American Association of Naturopathic Physicians and the Institute for Natural Medicine, FAQs)

SB-2476

Submitted on: 1/28/2020 5:01:14 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Dr. Kevin R. Gibson	Individual	Support	No

Comments:

As a Naturopathic Physician who specializes in integrative oncology, I see patients every day who are in pain or have chemotherapy side effects that suppress their immune system, well-being, and appetite. Medical marijuana is an excellent tool to support patients through these compromised states.

At this time, I have to refer to other primary care doctors for marijuana access and this creates just another doctor visit. Patients undergoing cancer care are usually exhausted and have no interest in yet another doctor visit. Naturopathic Physicians who can facilitate medical marijuana access is instrumental in comprehensive patient care.

Thank you for your full consideration of the need. Please vote to SUPPORT HB1797.

Aloha,

Kevin Gibson ND, LAc, MS

SB-2476

Submitted on: 1/29/2020 11:19:45 AM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Dr. Ye Nguyen	Individual	Support	No

Comments:

SB-2476

Submitted on: 1/29/2020 4:05:31 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Dr. Rachel Klein	Individual	Support	No

Comments:



Steelsmith Natural Health Center

438 Hobron Lane, Suite 314, Honolulu, Hawaii 96815

www.SteelsmithHealth.com

(808)943-0330

To: Senator Rosalyn H. Baker, Chair
Senator Stanley Chang, Vice Chair
Members of the Committee on Commerce, Consumer Protection, and Health

From: Kristen Coles, ND, LAc
Steelsmith Natural Health Center

Re: SB2476, Relating to Medical Cannabis
January 31, 2020, at 9:30 am, Conference Room 229

Position: IN SUPPORT

Dear Chairwoman Baker and Members of the Committee on Commerce, Consumer Protection, and Health –

I am a practicing naturopathic physician in Honolulu and support SB2476. As a naturopathic physician our training is on par with other healthcare providers who currently have the ability to certify patients for the Hawaii Medical Cannabis program. Additionally, I would point out that naturopathic physicians are the leading experts trained in herbal medicine, which medical cannabis is an herbal derived product. In addition to being experts in botanical medicine, naturopathic physicians are primary care physicians and manage prescriptions for many of their patients. Please consider passing this bill as I believe the inclusion of naturopathic physicians to the providers that are eligible to certify patients for medical cannabis will be beneficial to the people of Hawaii.

Thank you,

Dr. Kristen Coles

SB-2476

Submitted on: 1/29/2020 5:38:10 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Elizabeth Winternitz	Individual	Support	No

Comments:

As a senior citizen and lifelong Hawai'i resident-- and a medical cannabis user -- I support this bill.

SB-2476

Submitted on: 1/28/2020 4:25:08 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Joseph Clinton Comstock Jr.	Individual	Support	No

Comments:

I strongly support SB2476 which would allow naturopathic physicians to certify the use of medicinal cannabis to their patients when indicated. Currently, only medical doctors, osteopathic doctors and a few other practitioners are able to certify patients for medicinal cannabis.

However, naturopathic physicians are also well trained in botanical medicine and familiar with the indications and contraindications of medicinal cannabis use.

SB2476 would allow naturopathic physicians to certify their patients to use cannabis by making amendments to allow naturopathic physicians to apply for a DEA number and a Controlled Substance License in Hawaii.

In addition to being well versed in herbal medicine, naturopathic physicians are considered primary care providers and prescribe pharmaceuticals when it is in the best interest of their patients.

Giving naturopathic physicians the authority to certify patients for the Hawaii Medical Cannabis Program would improve patient access to additional treatments which have been proven to be safe and effective.

Thank you.

Joseph Clinton Comstock, Jr.

SB-2476

Submitted on: 1/29/2020 11:53:01 AM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Julia Benkofsky-Webb	Individual	Support	No

Comments:

To: Senator Rosalyn H. Baker, Chair**Senator Stanley Chang, Vice Chair****Members of the Committee on Commerce, Consumer Protection, and Health****From: Julia Benkofsky-Webb, LMT Hawaii License# 5956****Re: SB2476, Relating to Medical Cannabis****January 31, 2020, at 9:30 am, Conference Room 229****Position: STRONG SUPPORT**

Current Hawaii law states allows a Hawaii-licensed Medical Doctor, Doctor of Osteopathy, or Advanced Practice Registered Nurse to certify a patient for the Medical Cannabis Program.

The proposed legislation would allow Naturopathic Physicians to certify a patient for the Medical Cannabis Program by amending the law to authorize Naturopathic Physicians to obtain a Drug Enforcement Agency (DEA) number and a Hawaii Controlled Substance License.

Naturopathic physicians are uniquely qualified to assess patients for inclusion in the Medical Cannabis Program in Hawaii, having had intensive training in the use of botanical medicines. Numerous scientific studies have shown the effectiveness of cannabis in treating a wide variety of conditions. My personal experience is with cannabis as a treatment for pain caused by arthritic changes in my joints. I have

chosen to treat pain with cannabis rather than with pharmaceuticals, because i believe that this is a much safer, more effective route. It makes sense that I would be able to receive this treatment from my naturopathic physician, who comes from the perspective of treating the whole person—body, mind and spirit.

To allow the naturopathic physicians in Hawaii to participate in the Medical Cannabis Program better serves the people of Hawaii—rather than limiting this participation to the above named health care professionals. I strongly urge passage of this bill.

***Please feel free use this sample testimony. Change it. Make it your own.
Please do not just copy it. We really need your testimony.***

**To: Senator Rosalyn H. Baker, Chair
Senator Stanley Chang, Vice Chair
Members of the Committee on Commerce, Consumer Protection, and Health**

From: (Your Name), Clinic, City

**Re: SB2476, Relating to Medical Cannabis
January 31, 2020, at 9:30 am, Conference Room 229**

Position: STRONG SUPPORT

Current Hawaii law states allows a Hawaii-licensed Medical Doctor, Doctor of Osteopathy, or Advanced Practice Registered Nurse to certify a patient for the Medical Cannabis Program.

The proposed legislation would allow Naturopathic Physicians to certify a patient for the Medical Cannabis Program by amending the law to authorize Naturopathic Physicians to obtain a Drug Enforcement Agency (DEA) number and a Hawaii Controlled Substance License.

How and Why do Naturopathic Doctors Use Botanical Medicine?¹

Botanical medicine, also known as herbal medicine, is the science and practice of using medicinal plants and extracts to improve overall health, support wellness, and treat acute and chronic disease. Many conventional pharmaceutical drugs are derived from plants. Modern botanical medicine combines evidence-based science along with centuries-old experience to provide safe and effective treatments that support the body's ability to heal.

Botanical medicines are complex substances that differ in many ways from pharmaceutical drugs. There may be multiple active constituents, some that may have potential for dose-dependent toxicity. Botanical medicine may be contaminated in the growing or harvesting or manufacturing processes. They may be adulterated. They may interact with prescription drugs in positive or negative ways.

Naturopathic physicians are experts in botanical medicine and understand these complexities and how to use medicinal plants safely.

Cannabis is a perfect example of a complex plant that requires a different understanding than that required for a pharmaceutical cannabis-derived drug. In many other states, naturopathic physicians are authorized to prescribe cannabis and certify patients for medicinal cannabis. This authority comes with the responsibility of knowing what conditions may benefit from cannabis products, as well as conditions for which cannabis may be of no use.

Botanical medicine expands treatment options for patients. Alone or in combination with other naturopathic treatments, botanical medicines can be a safe, appropriate, and effective choice for addressing numerous health concerns ranging from frequent illness to gastrointestinal discomfort to depression, and more. During medical school, NDs complete an average of 130 classroom hours of botanical medicine education.

A cornerstone of naturopathic medicine, botanical medicine is one of the most effective therapies that licensed naturopathic doctors (NDs) use to gently and safely treat illness while minimizing the risk of harmful side effects

¹ Patricia Gaines, ND, and Sheila Kingsbury, ND, *How and Why do Naturopathic Doctors Use Botanical Medicine?* (American Association of Naturopathic Physicians and the Institute for Natural Medicine, FAQs)

Botanical medicine is taught in a series of courses that build upon each other through an ND's four-year, science-based medical education. Naturopathic medical schools are accredited and are recognized by the United States Department of Education. In addition to classroom study, naturopathic medical students refine and apply learnings in various settings, including over 1,200 hours of clinical rotations with patients.

Naturopathic Botanical Medicine Curriculum

Through this rigorous curriculum, naturopathic doctors learn how to choose and effectively prescribe herbal medicines to treat the underlying cause(s) of illness, minimize side effects and drug interactions, and individualize doses and formulations for the maximum therapeutic benefit. Core areas of focus in naturopathic botanical medicine curriculum include:

- History and current use of Western herbal medicine
- Herbal properties and actions of plants
- Herbal constituents (compounds that have medicinal properties), medicinal actions (function in the body), and indications
- Critical evaluation of literature and research in regard to both efficacy and interactions/contraindications of botanical medicines
- Optimal extraction and delivery for a variety of plants
- Botanical prescription writing
 - Organ systems-based botanical medicine formulation and topical application, including gastrointestinal, respiratory, immune, cardiovascular, ears/eyes/nose/throat, reproductive, urinary, endocrine, musculoskeletal, and nervous systems
- Choosing, assessing and preparing herbal medicine in various forms including aqueous extracts, tinctures, herbal oils and salves, syrups, capsules, oxymels, poultices, and compresses. This includes evaluating comparable advantages and disadvantages of each type of preparation
- Dose ranges, contraindications, toxicity, side effects, and interactions
- Sustainability of herbal medications
- Effective creation of individualized formulas for patients
- Translation of labels to determine the purpose and application of over-the-counter herbal products

This comprehensive training combined with a focus on treating the whole person—mind, body, and spirit—enables naturopathic doctors to utilize botanical medicine when best suited to effectively treat the patient based on their diagnosis and presentation. By spending extra time to evaluate and diagnose patients and then drawing on a spectrum of therapies including botanical medicine, clinical nutrition, and behavioral and lifestyle medicine, naturopathic doctors tailor comprehensive treatment to each patient, with a close eye on safety.

In addition to being experts in botanical medicine, naturopathic physicians are primary physicians and manage prescriptions for many of their patients. Adding naturopathic physicians to the provider types eligible to certify patients for the Hawaii Medical Cannabis program would increase access to healthcare and benefit the people of Hawaii for whom medical cannabis may be a good therapeutic option.

SB-2476

Submitted on: 1/28/2020 8:34:10 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Laurie Steelsmith	Individual	Support	No

Comments:

To: Senator Rosalyn H. Baker, Chair, Senator Stanley Chang, Vice Chair, and Members of the Committee on Commerce, Consumer Protection, and Health**From: Dr. Laurie Steelsmith N.D., L.Ac.****Re: SB 2476, Relating to Medical Cannabis
(January 31, 2020, at 9:30 am, Conference Room 229)****Position: SUPPORT**

Dear Senator Rosalyn Baker, Senator Stanley Chang, and Members of the Committee,

Please support the passage of SB 2476 to expand the law to allow Naturopathic Physicians to certify patients for medical cannabis use. Current Hawaii law gives this responsibility to Medical Doctors, Doctors of Osteopathy, and Advanced Practice Registered Nurses, but inexplicably excludes Naturopathic Physicians. It is highly appropriate to amend the law to authorize Naturopathic Physicians to share this responsibility.

Naturopathic Physicians are the most highly qualified experts in botanical medicine and understand the complexities of prescribing medicinal plants safely and effectively. In Naturopathic Medical School, we complete an average of 130 classroom hours of botanical medicine education. Because of this, the training of Naturopathic Physicians in the U.S. is widely considered the world's best medical education in this area of medicine. This is why many other states already authorize Naturopathic Physicians to prescribe cannabis and certify patients for medicinal cannabis.

Expanding our law on this issue to include Naturopathic Physicians will increase access to health care and benefit the people of Hawaii for whom medical cannabis may be an appropriate therapeutic option.

Thank you,
Dr. Laurie Steelsmith N.D., L.Ac.

www.DrSteelsmith.com

SB-2476

Submitted on: 1/29/2020 9:43:31 AM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Marilyn Markley	Individual	Support	No

Comments:

Cannabis is by far the best pain relief for my often severe gut pain. Demonstrably fewer side effects than any thing else with even close to same, almost immediate results in relief. It is imperative to give licensed medical doctors who are naturopathic practitioners (N.D.) the legal right to prescribe it in whatever form they advise. We in Hawaii pride ourselves in being progressive and leading nation in many ways. After a bold start, we have fallen behind in making this important medication legally and readily available. Allowing naturopathic DOCTORS to prescribe it is only rectifying the error of failing to include them in the enabling legislation originally. Again, they are physiicians fully qualified to be primary care providers.

SB-2476

Submitted on: 1/28/2020 5:43:36 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
matthew heiller	Individual	Support	No

Comments:

Regardless of the medical title- naturopath, surgeon, osteopath...- I think that the quality of the relationship between medical professional and patient is the most important criteria. Naturopaths are cheaper to see than specialists, they tend to see their patients more often than MDs. Given the lack of deaths from THC compared to opiates, barbiturates and amphetamines, Naturopaths being able to prescribe marijuana doesn't seem like it will negatively impact the overall health of our citizens.

SB-2476

Submitted on: 1/28/2020 5:04:39 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Rodney Evans	Individual	Support	No

Comments:

I support the continued legalization and DEregulation of this safe natural homeopaths food and mediicine. Total legalization, please!

SB-2476

Submitted on: 1/29/2020 11:07:47 AM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Troy Abraham	Individual	Support	No

Comments:

SB-2476

Submitted on: 1/29/2020 12:01:46 PM

Testimony for CPH on 1/31/2020 9:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Valerie L Simonsen ND	Individual	Support	No

Comments:

To: Senator Rosalyn H. Baker, Chair

Senator Stanley Chang, Vice Chair

Members of the Committee on Commerce, Consumer Protection, and Health

From: Valerie L Simonsen ND

YOU KNOW MORE

#7 Heona Place, Kihei Hawaii 96753

Re: SB2476, Relating to Medical Cannabis

January 31, 2020, at 9:30 am, Conference Room 229

Position: STRONG SUPPORT

Please support Naturopathic physicians in this cause to bring optimal health care to the community. Malama Pono!

Mahalo

Dr Valerie Simonsen