

1. CCSM is a consumer advocacy group, with special concern about making health decisions based on reliable evidence, which only science can provide. This is not a consumer-driven bill; to my knowledge, ours is the only independent consumer group you will hear from today.
2. CAND has jumped the queue on this bill. It has subverted the Sunrise process and effectively prevented some stakeholders, particularly health consumers, from making a full case of their concerns.
3. The state of this bill is proof of concept for the Sunrise process, which is intended to vet info for legislators before it gets into your sausage-maker. The bill now is nothing like originally introduced — not that the introduced version was good — but the legislative process thus far has made a bad bill very much worse. In various legislative deals, all consumer protection has been removed:
 - a. They say now that all of the practitioners who cause harm will still be permitted to practice.
 - b. Authority has gone from a regulatory board to a DORA czar with no expertise. This is the worse possible regulatory scheme.
 - c. The advisory cmte (previously licensing board) is not directly accountable to elected authorities, and is packed with pro-practitioner constituents.
 - d. There is no objective basis for regulating practitioners of “naturopathic medicine”; it is too eclectic and not rooted in scientific evidence. No one will ever be found guilty of substandard naturopathic practice, because there is no such thing as standard.
 - e. There is no effective malpractice requirement, so no recourse for injured clients, and no acceptance of personal responsibility for those who want to practice independently as “primary care physicians”. In particular, the lack of a minimum maximum (ie, per incident) guarantees that no lawyer will ever take a malpractice case against a registered naturopath.
 - f. As Kopel’s letter to you points out, this forms a cartel, which is precisely the opposite of what proponents say they are trying to do with this bill.
 - g. This is really all about creating a market for the graduates of Bastyr through legislative fiat. It is crony capitalism at its worst.
4. Nearly all of the cases of harm cited by CAND come from naturopaths trying to practice actual medicine, not naturopathy at all.
5. There are only 59 members of CAND. (The DORA minimum is 250.) They keep inflating the numbers — first, 120; then, 150 — but these are all speculative. And as others will tell you, these represent at most 3-5% of the naturopaths, namely just those that are physician-wannabes.

6. The proponents of this bill are admitted scofflaws. Their unlawful actions in the absence of regulation raise serious doubts that they will obey the restrictions laid out in this bill.
7. There is no harm in not passing this bill at this time. But if we're right about any of what we say about the bill, there could be great harm done to consumer protection, and because of grandfathering, there is no going back.
8. There are fiscal unintended consequences: this likely will cost the state an additional \$83 million more annually in Safety Net expenditures. Think about where this money must come from and what good it would do if it was available to spend elsewhere.