



Natural Medicine of Denver
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February 14, 2020

Public Health Care & Human Services Committee
Sunset Review Hearing HB20-1212

Good morning Mr. Chairman and Members,

My name is Dr. Rachelle Forsberg, and I am here on behalf of the Colorado Association of Naturopathic Doctors.

As a Naturopathic Doctor practicing in the Denver area, I would like to request your support of our bill renewal HB20-1212. Naturopathic medicine plays an integral role in the landscape of our healthcare system here in Colorado. Since our registration, we have seen the number of Naturopathic Doctors practicing in Colorado grow exponentially. In just the past 6 years, our number has tripled: with roughly 90 NDs registered in Colorado in 2014 and now 197 NDs are on the roster.

In fact, I am one of those recently registered Naturopathic Doctors in Colorado.

In 2018, after 8 years of practice in Washington State, I fulfilled my dream of returning to my home state of Colorado to establish a naturopathic medical clinic. This was made possible by Colorado's recent registration of Naturopathic Doctors. I am now able to maintain a successful career and raise my family in my home state, close to loved ones and the natural beauty that only Colorado has to offer.

My time in practice in Washington provided me the opportunity to see the incredible impact that regulated naturopathic medicine has on a state's overall healthcare system as well as its economy, and I am excited to see that same growth and potential here in Colorado.

According to the CDC, at least 40% of Americans are utilizing natural and alternative medicine on a regular basis – and we are only seeing that number rising. Registering Naturopathic Doctors in Colorado helps to ensure that these medical services being sought after by consumers are safe and appropriate.

By regulating naturopathic medicine, Colorado draws experts in the field to practice here; providing a steady stream of medical-tourism, attracting patients from other states



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and countries to visit Colorado. Additionally, we will be hosting the national conference for the American Association of Naturopathic Physicians here in Denver this summer, drawing doctors and other professionals from around the globe to attend this event.

It's also worth noting that because of our emphasis on evidence-based preventative healthcare, naturopathic medicine provides huge benefits to Colorado employers by reducing the number of employee sick days and reducing insurance costs related to preventable illness. Corporate health management programs associated with prevention and wellness showed a 26% reduction in health care costs and six dollars returned for every dollar invested.

Because of HB20-1212, Colorado is on the leading edge of innovations in evidence-based preventative medicine. I urge your YES vote to support this continued growth and innovation.

Thank you for your time. I am happy to take any questions.



Naturopathic Care Produces Cost Savings

- Vermont Automobile Dealers Association saved approximately \$1,500,000 in direct and indirect healthcare costs by using naturopathic wellness Interventions over a one-year period.¹
- Naturopathic Interventions yielded a total estimated net cost savings of approximately \$1000 per patient with low back pain.²
- A Blue Shield of Washington study found that utilizing NDs would reduce cost for chronic and stress related illness up to 40% and cut costs of specialist utilization by 30%.³
- A more recent comparison revealed a \$356 annual health cost savings for each user of Complementary and Alternative Medicine (CAM) when compared to CAM nonusers.⁴
- CAM users averaged \$1,420 less in annual health care expenditures than nonusers in patients with the heaviest disease burden.⁵
- Changes in lifestyle and stress reduction a major focus of naturopathic medicine could save the US \$10 billion annually in reduced coronary angioplasty procedures and coronary bypass operations alone, and insurance savings of almost \$30,000 per patient.⁵
- Corporate health management programs associated with prevention and wellness showed a 26% reduction in health care costs and a \$6 returned for every \$1 invested.⁶
- Median per-visit expenditures were \$39.00 for CAM care and \$74.40 for conventional outpatient care in Washington. The total expenditures per enrollee were \$2,589, of which only \$75 (2.9%) was spent on CAM⁶
- A systematic review of cost benefit analyses of CAM compared to conventional care revealed 42% of the published studies showed cost savings Meeting Growing Consumer Demand for Integrative Therapies.
- Survey results of over 2000 US households showed 67.6% of respondents used at least one CAM therapy in their lifetime.⁷

1. Am. J. Health Promot. 2000 Sep-Oct; 15(1):45-52.

2. Altern. Ther. Health

3. Henry. 1995. King County Medical Blue Shield Phase I Final Report: Alternative Healthcare Project Steering Committee. August 5, 1995.

4. Lind, BK, Lafferty WE, Tyree We, Diehr, PK. 2010. Comparison of Health Care Expenditures Among Insured and Nonusers of CAM Medicine in Washington State: A Cost Minimization Analysis. J. of Alt. and Comp. Med. 16(4) 411-417.

5. Guameri E, Horingan, BJ, Pechura, CM. 2010. The Efficacy and Cost-Effectiveness of Integrative Medicine: A Review of the Medical and Corporate Literature. Bravewell Collaborative Report. June, 2010.

6. Lafferty, WE, Patrick TT, Bellas, AS, Watts, CA, Lind, BK, Sherman, KJ, Cherkin DC, Grembowski, DE. 2006. Insurance Coverage and Subsequent Utilization fo CAM Medicine Providers. Amer. J. of Managed Care 12:397-404.

7. Annals of Internal Medicine. 135(4): 262-268.

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February 4th, 2020

Re: Naturopathic Doctor Sunset Review stance on Advisory Committee

To Whom It May Concern,

My name is Kaycie Rosen Grigel, ND, and I am a Naturopathic Doctor who has been practicing here in Colorado since 2006. Before this I practiced in Anchorage, Alaska from 2003-2006. In the past 17 years, I have had the opportunity to practice in states where naturopathic medicine has been both regulated and unregulated, and have gotten to see and experience firsthand the enormous benefit to health care consumers who have the choice to seek out regulated naturopathic care. With that in mind, it has been a wonderful opportunity to participate in Colorado's regulatory scheme for NDs both as a practicing doctor and as a member of the Advisory committee. I have been on the committee since its formation in January 2014.

In reading over DORA's sunset review and recommendations for Naturopathic regulation in Colorado, I see that there is a recommendation to discontinue the Advisory committee. I think that removal of this committee from our regulatory scheme is problematic for DORA, for Naturopathic doctors, and for the public.

Currently, the Naturopathic medicine program in Colorado is overseen by a Director with an Advisory committee to inform his or her decisions. While other similar professions in Colorado do not have an advisory committee, they have an autonomous board made up of members of the profession and public members that make decisions on application approvals and enforcing the practice act. As in any highly specialized field, the people most qualified to make decisions regarding the oversight of its members are part of the profession. For this reason, I strongly believe that if the director model is continued for the Naturopathic Medicine program an Advisory Committee is crucial. If DORA does not feel that the director model is working well, then this should be replaced with an autonomous board. As an example, here are the board structures for several other professions in Colorado:

- **Medical Doctors, Doctors of Osteopathy, and Physician Assistants:** The CMB is a Type I Board, meaning that it is policy autonomous and comprised of professional and public members (eight M.D.s, three D.O.s, one P.A., and four public members).
- **Doctors of Chiropractic:** The (Chiropractic) Board meets regularly to approve license applications and enforce the chiropractic rules, regulations, and practice act that governs the profession and is authorized to take disciplinary action against those who have violated the Chiropractic Practice Act, Rules, and Regulations. The Board reviews complaints about chiropractors and utilizes the Division's Office of Investigations to investigate complaints when necessary.
- **Physical Therapists:** The Colorado State Physical Therapy Board regulates individual physical therapists and physical therapist assistants. The Board meets regularly to approve

license/certification applications and enforce the rules, regulations, and practice act that governs the profession. The Board reviews complaints about physical therapists and physical therapist assistants and utilizes the Division's Office of Investigations to investigate complaints when necessary. The Board is authorized to take disciplinary action against those who have violated the Physical Therapy Practice Act, Rules, and Regulations.

The oversight of the Naturopathic Medicine program in Colorado has turned over several times just in the few years that I have been on the Advisory Committee. Each time this position has turned over, the new program director has had to learn and ask questions of the Committee about what our profession is, how we are educated, and how we practice. The only continuity the program has had in terms of people who have been present to see the evolution of the practice act and its rules are the members of the Advisory Committee. Furthermore, Naturopathic medicine is not a well understood profession and the subtleties of what we are qualified to do take time to learn. As I mentioned before, the best decisions are made by those who have the experience and knowledge of the profession.

The statement I find troubling in the Sunset review regarding the continuation of the advisory committee says the committee was "originally created to provide guidance and advice on the initial development of the rules and policies associated with the registration of NDs." While it is absolutely true that we served in that capacity, my understanding is that the intent of the committee is to continue in an advisory role to help the Director make good decisions about how to implement our law. While the general rules and practices for overseeing our profession have been established in Colorado, questions regarding how those rules should be applied to specific situations will still arise. If members of the profession and public members who are knowledgeable about the profession are not available to help interpret these rules, it will be extremely difficult for DORA to make appropriate decisions on how or whether to discipline a registrant. Additionally, if new rules are made and need to be interpreted, the Director will need an Advisory Committee to help guide rulemaking.

Again, I just want to emphasize that in the interest of health care consumers of Colorado and the Naturopathic medical profession, I believe that if the director model is continued an advisory committee is crucial, and otherwise I would advocate for shifting to the model of having an autonomous board to oversee the implementation of rules for the Naturopathic doctor profession.

Thank you for your time. Feel free to contact me with any questions or concerns.

In good health-

Kaycie Rosen Grigel ND

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