



To: Senate Public Health and Welfare Committee  
From: Rachelle Colombo, Director of Government Affairs  
Date: March 14, 2019  
Re: HB 2185; allowing Naturopathic doctors to order diagnostic imaging

The Kansas Medical Society appreciates the opportunity to provide neutral testimony on HB 2185, allowing naturopathic doctors to order diagnostic imaging. In an effort to obtain background on the genesis of this bill, I reached out to the proponents as well as to the Kansas Board of Healing Arts for clarification about its necessity.

K.S.A. 65-7202 establishes both generally and specifically what the scope of practice is for naturopathic doctors. Statute clearly identifies those categories of diagnosis and treatment within the scope of practice of naturopathy as well as the categories outside naturopathic scope of practice.

Specifically, statute authorizes the following six categories:

- (1) “Food, food extracts, vitamins, minerals, enzymes, whole gland thyroid, botanicals, homeopathic preparations, nonprescription drugs, plant substances that are not designated as prescription drugs or controlled substances, topical drugs as defined in . . . ;
- (2) health care counseling, nutritional counseling and dietary therapy, naturopathic physical applications, barrier contraceptive devices;
- (3) substances on the naturopathic formulary which are authorized for intramuscular or intravenous administration pursuant to a written protocol . . . ;
- (4) noninvasive physical examinations, venipuncture to obtain blood for clinical laboratory tests and orofacial examinations, excluding endoscopies;
- (5) minor office procedures [generally defined as treatment of superficial wounds not requiring suturing]; and
- (6) naturopathic acupuncture.”

Statute also specifically identifies several categories that fall outside the scope of naturopath:

“A naturopathic doctor may not perform surgery, obstetrics, administer ionizing radiation, or prescribe, dispense or administer any controlled substances . . . or any prescription-only drugs except those listed on the naturopathic formulary . . .” K.S.A. 65-7202(b).

As you can see, diagnostic imaging is neither specifically included or prohibited and was therefore unclear. The Kansas Medical Society does not object to providing statutory clarity around the ordering of diagnostic imaging. However, we do have concerns about other language that has been introduced that goes beyond this particular issue and amends the clear authority and prohibitions outlined in the naturopathic practice act. As such, we respectfully request that HB 2185 not include other provisions altering scope of practice. Thank you.