



April 9, 2020

The Honorable Nancy Pelosi
Speaker of the House
Washington, DC 20515

Minority Leader Kevin McCarthy
Minority Leader of the House
Washington, DC 20515

Dear Speaker Pelosi and Minority Leader McCarthy,

On behalf of the **American Association of Naturopathic Physicians (AANP)** and the **Association of Accredited Naturopathic Medical Colleges (AANMC)**, we thank you for leading efforts to mitigate the health care and economic impact of the COVID-19 crisis. Naturopathic Physicians are proud of the care we have continued to provide patients during this public health emergency. We urge you to provide urgent and necessary support for Naturopathic Physicians as you work to develop the fourth COVID-19 response plan.

The AANP represents 8,000 licensed Naturopathic Physicians (NDs) who are licensed or regulated in 25 states and territories and who provide care to over 4 million patients annually. The AANMC represents the accredited naturopathic medical colleges in North America, including over 2,000 naturopathic medical students, naturopathic medical faculty, research and academic medical centers, and academic support staff. With over 10 million patient visits a year, NDs serve in primary and specialty care settings, including hospitals and federally qualified health centers (FQHC's) for patients of all ages.

Most naturopathic physicians operate independent primary care clinics and are experiencing a stark financial impact of both increased costs to manage patients appropriately during the pandemic and dramatically decreased revenue due to a reduction in clinical visits and procedures. The AANP estimates that most clinics have seen at least a 50% reduction in patient visits and revenue, and/or closed entirely since mid-March, and this number will increase without immediate governmental financial assistance.

In addition, the United States Department of Education recognized naturopathic institutions including naturopathic academic medical centers and community teaching clinics annually provide millions in free care to at-risk patient populations and train the future naturopathic medical workforce. One hundred percent of these teaching clinics have already been forced to close their doors to normal operations, and

because our nation will continue to battle COVID-19 in the coming months, these clinics will require federal monies in order to reopen to patients and students at any point in the near-term. The naturopathic medical programs do not qualify for much of the existing assistance, as it is geared to students and Pell Grant recipients.

Furthermore, because federal statutes do not include naturopathic physicians on the Centers for Medicare and Medicaid's (CMS) list of health care professionals, we do not qualify for the Public Health and Social Services Emergency Fund and therefore cannot apply for the current federal financial assistance funds for healthcare providers.

While CMS has worked diligently to expand access to care, Congress can directly assist by:

1. **Including “state-licensed, registered and/or nationally certified” when referring to “Health Care Professionals” in all sections of COVID-19 related legislation** to ensure licensed naturopathic physicians qualify for federal assistance
2. **Expand Medicare provider enrollment through CMS to include licensed naturopathic physicians** who can help lower the hospital patient surge during this national health emergency
3. AANMC appreciates the higher education allocation in the initial relief packages, however **that funding is not adequate to cover COVID-19-related losses at the accredited naturopathic campuses**; we ask that future relief packages specifically address the needs of the academic institutions to secure the future naturopathic workforce.

As our nation will continue to address the urgent health care needs related to COVID-19, naturopathic physicians urge you to address our practices' and educational institutions' financial strain so we can continue to care for patients and reduce the strain on our health care system. Furthermore, in expanding our ability to provide for the health care needs of Medicare patients we can best support other health care clinicians during these unique times.

Thank you for your leadership throughout this pandemic. Please do not hesitate to contact me with any questions you may have regarding our needs and the best way our clinicians can support the health care needs of Americans.

Sincerely,

Robert Kachko ND LAc

Robert Kachko, ND, LAc
AANP President

JoAnn Yanez, ND, MPH, CAE

JoAnn Yanez, ND, MPH, CAE
AANMC Executive Director



April 2, 2020

The Honorable Nancy Pelosi
Speaker of the House
Washington, DC 20515

Minority Leader Kevin McCarthy
Minority Leader of the House
Washington, DC 20515

Dear Speaker Pelosi and Minority Leader McCarthy,

On behalf of the **Integrative Health Policy Consortium (IHPC)** (www.ihpc.org) we congratulate you on leading efforts to enact the Coronavirus Aid, Relief and Economic Security (CARES) Act (P.L. 116-136). The law will help millions of Americans and businesses affected by the ongoing COVID-19 pandemic.

We are pleased you intend to introduce a fourth COVID-19 economic relief package that will focus on meeting the needs of health care professionals. Despite the ambitious reach of the **CARES Act, its provisions** could be strengthened by including *thousands of integrative health professionals* and their patients, who are being adversely affected by the COVID-19 pandemic. Many integrative professionals are treating patients during this public health crisis; however, their practices have been devastated by the crisis, rendering them unable to deliver necessary care and services and support their livelihoods.

IHPC represents 26 organizations and more than 650,000 *state licensed and nationally certified healthcare professionals who generate annually nearly \$27 Billion in the U.S. economy*. We share the integrated health professional team approach that the Nation is employing to combat COVID-19. This approach applies the full spectrum of care, continuously informed by the best scientific evidence to optimally treat every patient and inform the public during this critical time. This team approach *integrates* the best of (1) medicine from testing through treatment and recovery, (2) optimal delivery of effective preventive and health-enhancing practices, and with (3) all evidence-based therapies to treat physical and mental health challenges in patients and the public.

As you and your colleagues craft a fourth COVID-19 relief package, we respectfully ask that you consider including the following provisions to address the immediate needs of integrative health care professionals.

Summary of IHPC's Requests: Please refer to attached Addendum for more details.

- 1. Provide direct economic relief to *all state-licensed and/or nationally certified Integrative Health Care providers, their small businesses, students and Institutions.***
 - Insert *"state-licensed and/or nationally certified"* when referring to "Health Care Professionals" in all sections of Stimulus or Recovery Acts. Without this phrase many integrative health providers are not included.
 - Allocate \$500 million in micro-grant support for the integrative health professionals who are state-licensed and/or nationally certified providers of integrative and whole person health care services to ensure these providers remain part of the workforce during this national emergency.
 - Include any integrative health professional associations, nonprofits and other tax-exempt organizations, and their workers for support within any federal aid packages or supplemental

appropriations measures, as many have been and will be harmed by event cancellations due to quarantining, social distancing and other public health measures.

2. **Expand HRSA's National Health Service Corps to include integrative health professionals** who are *state licensed and/or nationally certified providers*. These professionals are important members of the integrated health professional team supporting the U.S. population to cope and recover from COVID-19. We recommend you explore and implement student loan debt forgiveness immediately and over time for integrative health graduates.
3. **Expand Medicare coverage through CMS** for *all integrative health providers who are state-licensed and/or nationally certified*. Currently most of our providers are not included.
4. **Expand telehealth coverage** for services by *all integrative health providers who are state-licensed and/or nationally certified*.
5. **Allocate immune/respiratory research support of \$20 million be directed at the National Center for Complementary and Integrative Health (NCCIH)** at the National Institutes of Health (and other institutes and centers, including NIA, NHLBI, and NCI) and of **\$20 million be directed to the Department of Defense, Defense Threat Reduction Agency (DTRA)**.

Thank you for considering our request and for your stalwart leadership during these uncertain and difficult times. IHPC looks forward to working with you and your colleagues.

Sincerely,

Tracy Bowen
Executive Director
Integrative Health Policy Consortium, IHPC
(202) 746-1663 / tbowen@IHPC.org

Gerald Clum, D.C.
Co-Chair
IHPC, Board of Directors
gerrycdc@aol.com

Sharad Kohli, M.D.
Co-Chair
IHPC, Board of Directors
skohli@ihpc.org

cc: The Honorable Judy Chu, Co-Chair, Integrative Health & Wellness Caucus
The Honorable Jackie Walorski, Co-Chair, Integrative Health & Wellness Caucus
The Honorable Tim Ryan, Member, Integrative Health & Wellness Caucus
The Honorable Fred Upton, Member, Integrative Health & Wellness Caucus
The Honorable Kathy Castor, Member, Integrative Health & Wellness Caucus
The Honorable Peter DeFazio, Member, Integrative Health & Wellness Caucus
The Honorable Ted Lieu, Member, Integrative Health & Wellness Caucus
The Honorable Raul Grijalva, Member, Integrative Health & Wellness Caucus
The Honorable Brett Guthrie, Member, Integrative Health & Wellness Caucus
The Honorable Jamie Raskin, Member, Integrative Health & Wellness Caucus
The Honorable Nita Lowey, Chair, U.S. House of Representatives Appropriations Committee
House Majority Whip James Clyburn, U.S. House of Representatives
Minority Leader Kevin McCarthy, U.S. House of Representatives

ADDENDUM: BACKGROUND OF REQUESTS:

Integrative health providers, their educational & training institutions, their students and support associations have been profoundly and negatively impacted by COVID-19. Your support for this request ensures that the integrative health professionals and industry can safely provide continued support to their patients, and ensures the integrative health sector as a whole will not lose infrastructure and capacity to support Americans in need in the coming months as we cope and recover from this international pandemic.

1. **Provide direct economic relief to all state-licensed and/or nationally certified Integrative Health providers, their small businesses, students and institutions**

- A. Insert the phrase ***“state-licensed and/or nationally certified”*** when referring to “Health Care Professionals” in all sections of Stimulus or Recovery Acts. This is essential. Without this phrase being inserted, integrative medicine and whole person health professionals are not included.
- B. **Allocate \$500 million in micro-grant support for the integrative health professionals** who are state-licensed and/or nationally certified providers of integrative and whole person health care services to ensure these providers can remain part of the workforce during this national emergency. More than 554,000 of these health professionals operate their own small businesses with over 1 million employees who generate nearly \$27 Billion annually to the U.S. economy. Most are unable to provide services and are not receiving any income during this COVID-19 pandemic. It is critical to financially support this sector of health care providers during this crisis so they can continue to provide services as America is coping and recovering from COVID-19.
- C. **Include any Integrative Health professional associations, nonprofits, educational and training institutions, and other tax-exempt organizations and their employees for support within any federal aid packages or supplemental appropriations measures** as many have been and will be harmed by event cancellations due to quarantining, social distancing and other public health measures. Financial impacts from COVID-19 stem from class cancellations, project stoppage, unexpected costs, and reduced meeting attendance and education programming and trainings. The fast-spreading COVID-19 pandemic has prompted the cancellation of dozens of major conferences, educational meetings and events in the U.S. and forced other event sponsors to consider cancelling or postponing innumerable other events dependent on in-person attendance at convention centers, hotels and other event facilities. The Integrative Health industry, its professionals, health care providers, workers, educators, students and organizations have been deeply impacted.

2. **Expand HRSA’s National Health Service Corps to include integrative health professionals who are state licensed and/or nationally certified providers.** This will address current and future health care professional shortages, as being demonstrated during the COVID-19.

- A. Include employment at integrative educational and training institutions in HRSA’s Faculty Loan programs.
- B. Explore and implement student loan debt forgiveness immediately and over time for integrative health graduates recognizing the significant long-term systemic impact of COVID-19 on our economy and the significant strain student debt poses on our system and impacts addressing our health service worker shortage.

3. **Expand Medicare coverage through CMS for *all state-licensed and/or nationally certified integrative health providers.*** Currently most of our providers are not included.

4. **Expand telehealth coverage for integrative health care services.** We acknowledge and deeply appreciate the recent reforms that Medicare has already made for telehealth services (*Coronavirus Preparedness and Response Supplemental Appropriations Act*), however, **many of our practitioners are still unable to provide critical patient care services utilizing telehealth. We urge you to:**

- A. Provide the Secretary of Health and Human Services (HHS) with the ability to include expanded Medicare telehealth coverage not only for physicians, but *for all state-licensed and/or nationally certified providers of integrative and whole person health care* services so that they can help effectively meet the urgent health needs of their communities.
 - B. Provide the Secretary of HHS with the ability to include expanded telehealth coverage ability to *extend to non-Federal programs not only for physicians, but for all state-licensed and/or nationally certified providers of integrative and whole person health care services*.
 - C. Legislate consistency of access to telehealth, as well as meaningful reimbursement mechanisms and values, across the insurance industry.
 - 1. Currently telehealth availability and reimbursement are inconsistent and unusable by many consumers and providers. Health plans shall reimburse providers at the same rates, whether the service is provided in-person or through telemedicine.
 - 2. All state licensed and/or nationally certified healthcare professionals shall be granted rights to the practice of telehealth, regardless of contracting rules prior to the COVID-19 crisis.
 - 3. Payers, whether Medicare, Medicaid or non-Federal programs, shall not limit the types of licensed clinicians able to treat via telehealth as long as the services provided are clinically appropriate.
 - 4. Further, telehealth shall be allowed and reimbursed the same regardless of whether the patient connection is made by voice only (e.g. via telephone), or via a visual interface platform.
 - 5. Patient cost-sharing in visits shall be made equal to that expected during in-person care.
 - D. Remove restrictions on the practice of telehealth across state lines for non-Federal healthcare programs, and allow telehealth services to be tied to the provider location and licensure rather than to the location of the patient.
5. **Allocate at least \$20 million be directed to the National Center for Complementary and Integrative Health (NCCIH) at the National Institutes of Health (and other institutes and centers, including NIA, NHLBI, and NCI) and of at least \$20 million be directed to the Department of Defense, Defense Threat Reduction Agency (DTRA)** to conduct well-designed, basic science and clinical research for these complementary, integrative and Whole Person Health approaches. The COVID-19 Global Pandemic has highlighted the gaps that remain in the scientific literature regarding the potential benefits to immune and respiratory function of established integrative health and whole person health approaches to preventing and treating infections and preventing epidemics. Many of these approaches are currently used by millions of Americans.

While there is peer reviewed scientific literature on immune function, including randomized trials that show beneficial findings, in order to close this gap and provide policy makers, public health officials, and the public evidence-based information in the COVID-19 pandemic, there is an urgent need to expand research on these well-established and widely practiced health approaches in the COVID-19, immune and respiratory function research portfolios. It is vital that the experts, organizations, and research/academic institutions from these professions and fields be included in the planning and implementation of the research. We recommend that the directors of the NCCIH and DTRA within 30 days of enactment to host a digital planning conference with other institutes and centers at NIH to create a draft strategic plan for these funds; and within 60 days, host the first in a series of digital town halls inviting input from the public, professional organizations, the scientific community, and other stakeholders.