

Dear Tasha Kleppner and Alyssa Black,

On behalf of the Vermont Association of Naturopathic Physicians (VANP), I appreciate the opportunity to provide comments on H.585, An Act Relating to Health Insurance Reforms.

VANP supports thoughtful reforms that improve affordability, streamline administrative burdens, and strengthen Vermont's healthcare system. As the Committee considers adjustments to insurance structures, utilization management, and provider participation, we respectfully request that the language and implementation of H.585 explicitly recognize and include licensed naturopathic physicians where appropriate.

Naturopathic physicians (NDs) are licensed primary care providers under Vermont law and deliver preventive, chronic disease, and whole-person care across the state, including in rural and underserved communities. Insurance reform initiatives often hinge on definitions such as "primary care provider," "participating provider," or "covered healthcare provider." If these terms are narrowed or not clearly inclusive, exclusion can occur unintentionally through omission.

We respectfully request consideration of the following:

1. Clarify that any reference to "primary care provider" or "healthcare provider" includes licensed naturopathic physicians practicing within their statutory scope.
2. Ensure that reforms affecting prior authorization, utilization review, or network participation apply equitably to all licensed primary care providers.
3. Maintain nondiscrimination principles so that insurers do not exclude or disadvantage provider types that are licensed and authorized to deliver covered services.
4. Align Medicaid and commercial insurance policy reforms to preserve access to naturopathic primary care services for Vermont patients.

Naturopathic physicians contribute meaningfully to Vermont's goals of prevention, chronic disease management, and cost containment. Ensuring equitable inclusion in insurance reform strengthens access and patient choice without expanding scope or creating new regulatory burdens.

We appreciate your consideration and welcome the opportunity to provide additional information or technical clarification as the bill advances.

Respectfully,

A handwritten signature in black ink, appearing to read "Steven Moore". The signature is fluid and cursive, with a large loop at the end.

Steven Moore, President & Legislative Chair