

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.680 (Primary Care Access Reform Program) and H.185 (Universal Primary Care Program).

VANP supports the Legislature's efforts to expand access to primary care, strengthen workforce sustainability, and explore innovative payment and delivery models. As these proposals advance, we respectfully request that licensed naturopathic physicians be explicitly recognized and included within the statutory language and implementation frameworks of both bills.

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. As Vermont considers reforms to primary care payment, access, and universal program design, it is important that all licensed primary care providers are eligible to participate fully.

With respect to H.680 and H.185, we respectfully request consideration of the following:

1. Ensure that any definition of "primary care provider," "primary care clinician," or "participating provider" explicitly includes licensed naturopathic physicians practicing within their statutory scope.
2. Structure eligibility criteria around scope of practice rather than degree type to avoid unintended exclusion.
3. Provide equitable participation and reimbursement structures for ND-delivered primary care services.
4. Include naturopathic physicians in advisory groups, planning bodies, or implementation workgroups established under either bill.
5. Align Medicaid and commercial integration provisions to preserve patient access to naturopathic primary care.

Naturopathic physicians contribute meaningfully to prevention, chronic disease management, and patient-centered care—goals that are central to both primary care access reform and universal primary care efforts. Explicit inclusion of NDs strengthens Vermont's primary care capacity without expanding scope or creating additional regulatory burden.

We appreciate your consideration and would welcome the opportunity to provide additional information or technical clarification as these bills continue to evolve.

Respectfully,

A handwritten signature in black ink, appearing to read 'Steven Moore', with a stylized flourish at the end.

Steven Moore, President & Legislative Chair