



VANP

PO Box 4351
Burlington, VT 05406

Dear Chair and Members of the House Committee on Health Care,

My name is Dr. Steven Moore, and I am a naturopathic physician practicing in Vermont as well as the President of the Vermont Association of Naturopathic Physicians (VANP). I am writing to introduce myself and to share brief comments as you begin markup of S.197, the Primary Care Payment Reform bill.

I want to first express appreciation for the Committee's work on this legislation. Efforts to strengthen primary care, improve affordability, and move toward more sustainable payment models are critically important for Vermont's healthcare system.

As you consider amendments and finalize language in S.197, I respectfully encourage the Committee to ensure that licensed naturopathic physicians are explicitly included where the bill references "primary care providers" or other participating clinicians.

Naturopathic physicians are licensed in Vermont to provide primary care services within our statutory scope. Across the state, NDs deliver preventive care, chronic disease management, and whole-person primary care—often in rural and underserved communities. According to the Vermont Office of Professional Regulation, there are over 400 licensed naturopathic physicians in Vermont, representing a meaningful and already established component of the primary care workforce.

S.197 presents an important opportunity to strengthen and expand primary care capacity. Ensuring that eligibility for participation in new payment models is based on scope of practice, rather than degree type, will help Vermont fully leverage its existing workforce without introducing new regulatory structures.

I respectfully encourage consideration of the following as the bill is marked up:

- Clarify that "primary care provider" includes licensed naturopathic physicians practicing within their Vermont scope of practice
- Ensure participation eligibility in any payment reform model is scope-based and inclusive
- Include naturopathic physicians in data collection, reporting, and stakeholder engagement processes

Naturopathic medicine's emphasis on prevention, chronic disease management, and patient-centered care aligns closely with the goals of S.197. Thoughtful inclusion of NDs will strengthen access, support workforce sustainability, and advance the bill's broader objectives.





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Thank you for your time and for your leadership on this important issue. I would be happy to provide any additional information or answer questions as the Committee continues its work.

Respectfully,

A handwritten signature in black ink, appearing to be 'S. Moore', written in a cursive style.

Steven Moore, ND
President, Vermont Association of Naturopathic Physicians

