



August 24, 2026

The Honorable Aisha Wahab
California State Senate
1021 O Street, Suite 8530
Sacramento, CA 95814

RE: SB 1303 (Wahab) – Naturopath Doctors (as amended 8/20/2026)
OPPOSE UNLESS AMENDED

Dear Senator Wahab:

The undersigned employers and workers' compensation insurers respectfully **OPPOSE SB 1303**, as amended August 20, 2026, unless the provision adding naturopathic doctors to the definition of "physician" under Labor Code section 3209.3 is removed. This is a substantial last-minute change to the workers' compensation system that has not been reviewed by the relevant policy committees in either house.

This amendment would have consequences far beyond simply allowing naturopathic doctors to provide treatment for injured workers. Section 3209.3 is a foundational provision of California's workers' compensation system. Defining naturopathic doctors as "physicians" would potentially allow them to serve as primary treating physicians, participate as physicians in Medical Provider Networks, make important medical determinations affecting an injured worker's claim, evaluate impairment, and, most concerning, become eligible for appointment as Qualified Medical Evaluators (QMEs).

Labor Code section 139.2 expressly provides that a physician, as defined in Section 3209.3, may be appointed as a QME if applicable requirements are satisfied. QMEs make consequential medical-legal determinations regarding industrial causation, permanent impairment, apportionment, disability, and other issues that directly determine an injured worker's benefits and an employer's liability.

California has appropriately established substantial profession-specific qualifications for individuals performing this work. An M.D. or D.O. seeking QME appointment generally must be board certified, have successfully completed an accredited residency program, or possess equivalent qualifications. Chiropractors must complete specific certification in California workers' compensation evaluation, and psychologists must meet additional postdoctoral experience or board-certification requirements.

SB 1303 establishes no comparable profession-specific qualification for naturopathic doctors. By simply adding naturopathic doctors to section 3209.3, the bill would make them eligible to seek QME

appointment under the general QME requirements without establishing additional standards appropriate to their education, clinical training, or experience.

Finally, naturopathic doctors are trained within a care model that differs from the framework on which California's workers' compensation system is built. California's Official Medical Fee Schedule (OMFS) is largely structured around treatments and services that are commonly reflected in conventional medical billing and treatment guidelines. There is no fee schedule for natural remedies (which may be commercial or unregulated products), which include homeopathy^[i], which is not FDA-approved by definition.^[ii] This lack of alignment will likely create uncertainty regarding treatment authorization, claims administration, and reimbursement, likely adding additional and unnecessary costs to the system.

The issue is not whether naturopathic doctors can provide valuable services within their lawful scope of practice. The question is whether their training and qualifications are appropriate for the broad responsibilities California assigns to a “physician” in its workers’ compensation system, particularly the responsibility to make complex medical-legal determinations concerning occupational injuries and permanent disability. SB 1303 does not demonstrate that they are, nor does it establish safeguards or limitations tailored to that expanded authority.

For these reasons, we respectfully **OPPOSE SB 1303** unless amended to remove the changes to Labor Code Section 3209.3

Sincerely,

American Property Casualty Insurance Association
Association of California Health Care Companies
California Association of Joint Powers Authorities
California Chamber of Commerce
California Coalition on Workers’ Compensation
California Special Districts Association
California State Association of Counties
Public Risk Innovation, Solutions, and Management (PRISM)
Rural County Representatives of California
Urban Counties of California

cc. Members, Assembly Insurance Committee
Office of Governor Gavin Newsom

^[i] See <https://naturopathic.org/page/WhatisaNaturopathicDoctor>.

^[ii] See <https://www.fda.gov/drugs/understanding-over-counter-medicines/homeopathic-products>.