



**2021 Senate Bill no. 2274**  
**House Human Services Committee**  
**Representative Robin Weisz, Chairman**  
**March 23, 2021**

Chairman Weisz and members of the House Human Services Committee, for the record my name is Todd Schaffer and I am a board-certified family medicine physician and vice president of clinic operations at Sanford Health in Bismarck. Before attending medical school, I completed a doctorate of pharmacy degree and practiced as a licensed pharmacist while putting myself through medical school.

I am here today representing the N.D. Hospital Association and its 46 member hospitals.

Thank you for this opportunity to speak in opposition to Senate Bill 2274, a bill that would dramatically expand a naturopath's scope of practice.

By definition, naturopathy is an alternative form of healthcare based on the theory that diseases can be successfully treated or prevented by vis medicatrix naturae, or the healing power of nature. This is based on the prescientific idea of vitalism, or life energy. Its foundation lies in the belief that the body has the innate ability to heal itself if balance is restored. Naturopaths share some common beliefs with evidence-based medicine, including the promotion of healthy lifestyles, diet, nutrition and prevention of disease. However, they also use modalities that have no evidence to support their use, including detoxification, hydrotherapy, chelation and, most importantly, homeopathy.

Homeopathy is [based on the notion](#) that miniscule doses of a toxin can cure certain medical conditions. A large and growing body of research has found that homeopathy doesn't work any better than a placebo, or sugar pill.

As such, many states do not license naturopaths and fewer allow broad prescribing authority for legend medications as is being pursued in North Dakota. Some states actually prohibit naturopath licensure all together.

SB 2274 expands a naturopath's scope of practice into dangerous territory—allowing naturopaths to prescribe medications they are not qualified to administer. In fact, naturopathy teaches that “allopathic” medicine uses medications that only suppress symptoms. This is why the curriculum of naturopathic schools spends more time teaching homeopathy than pharmacology. Naturopaths believe they treat the cause of illness and since their foundation have been firmly against the use of pharmaceuticals to treat disease.

I wish to be clear that this is not a turf war. Access to care in our rural state is a top priority for North Dakota healthcare providers and this legislative body. In my expert opinion, this is a discussion of science versus philosophy. The core practice of homeopathy is incompatible with known laws of physics, chemistry, biology and physiology. One cannot believe in homeopathy and the effectiveness of pharmaceuticals at the same time. As an example of homeopathy, consider oscillococcinum. This is a homeopathic product you can find on the shelves of most pharmacies used to treat respiratory infections and influenza. It is derived from duck liver and heart that is freeze-dried, processed and then diluted. It is listed as a 200C product, which means it has been diluted at a ratio of 1:99, 200 times. To put that in perspective, that means that there is 1 part remaining duck liver and heart in 1 with 400 zeroes behind it part water. There is only 1 with 100 zeroes molecules in the universe. In other words, there is zero percent chance that any of the original product is left. It is water. Anyone who believes in the therapeutic effect of a product like this is not qualified to prescribe medications.

SB 2274 opens the door to prescribing medications that will harm patients when not used appropriately. Excluding controlled substances from classes I-V only addresses medications with abuse potential. SB 2274 puts in play medicines with the potential for harm—antibiotics, antivirals (including those for hepatitis C and HIV), antineoplastics (chemotherapy),

anticoagulants (heparin, Coumadin, eliquis), cardiovascular drugs (such as antihypertensives, antiarrhythmics and statins), central nervous system agents (seizures, antidepressants, Parkinson's disease), insulin, testosterone, human growth hormone (HGH) and immunosuppressants.

The FDA's Adverse Event Reporting System (FAERS) already registers more than one million adverse drug reactions in patients prescribed meds by people with significantly more education than naturopaths. Expect that to increase if naturopaths are granted broad prescribing privileges.

Under current naturopathy provider licensing, naturopathic treatments are unlikely to cause harm. This bill would change that safety profile significantly, inevitably resulting in patient harm. I encourage you to vote no on SB 2274, effectively requiring those trained in naturopathy to practice only naturopathic medicine.

In summary, NDHA opposes this bill and asks that you give it a **Do Not Pass** recommendation. Thank you, Chairman Weisz and Committee. I'm happy to answer any questions.

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