



2021 Senate Bill no. 2274
Senate Human Services Committee
Senator Judy Lee, Chairman
February 1, 2021

Chairman Lee and members of the Senate Human Services Committee, I am Melissa Hauer, General Counsel of the North Dakota Hospital Association. I testify before you today regarding 2021 Senate Bill 2274 and ask that you give this bill a **Do Not Pass** recommendation.

Under current law, a naturopath may practice naturopathic medicine as a limited practice of the healing arts. The bill would greatly expand that scope and allow a naturopath to:

- Prescribe, dispense, administer, and procure drugs and medical devices;
- Plan and initiate a therapeutic regimen that includes ordering and prescribing nonpharmacological interventions, including durable medical equipment, nutrition, blood and blood products, and diagnostic support services, including home health care, hospice, and physical and occupational therapy;
- Prescribe and dispense schedule II through V substances as designated by the federal drug enforcement administration and all legend drugs;
- Dispense a drug if pharmacy services are not reasonably available, dispensing is in the best interest of the patient, or an emergency exists; and
- Request, receive, and sign for a professional sample and distribute a professional sample to a patient.

The physicians who are here to testify in opposition will give more detail, but our concern is that this bill will allow naturopaths to practice outside their training and experience and pose a potential for harm to patients.

Naturopathic practitioners resist drugs and surgery, relying instead on a variety of “natural” or “holistic” treatments to let the body heal itself. The belief is that medications do not treat disease, but rather mask it. Prescription medication seems antithetical to the basic premise of naturopathic theory. It is one of the reasons that naturopathic education does not prepare practitioners to prescribe medications safely and effectively. Naturopathic school requires only 72 hours of pharmacology education, and twice (144 hours) as much training in homeopathy. If a provider truly believes that homeopathy is a reasonable therapeutic intervention, why would they also seek to use modern pharmacology?

There are significant differences between physicians and naturopaths in training as well as education. Naturopathic practitioners are not as rigorously trained as medical doctors. Physicians receive their education through a four-year degree program at one of 183 accredited allopathic or osteopathic medical schools in the United States. Students spend nearly 9,000 hours in lectures, clinical study, lab, and direct patient care. Most family medicine residency programs, for example, require three years of clinical training and have specific requirements that must be met, such as a demonstrated competency in diagnosis and management and direct experiences in patient care, before students are eligible for board certification. Residency programs provide integrated experiences in ambulatory, community, and inpatient environments over three years of concentrated study and hands-on training.

In contrast, naturopathic education is completed through a four-year degree program that confers a Doctor in Naturopathy (ND) or Doctorate in Naturopathic Medicine (NMD). Naturopathic instruction requires 4,100 hours in coursework areas such as homeopathy and botanical “medicine” and 1,200 hours of clinical education, with 850 hours in direct patient care. Naturopathic degree programs do not require the same post-graduate residency training expected of medical school graduates.

To give prescription medications correctly and safely, one needs to understand anatomy, physiology, pharmacology, and the pathophysiology of diseases. Physicians, nurse practitioners, and physician assistants must have not only years of education in school but a

residency or other training to be able to appropriately prescribe medications. Naturopathic pharmacology education is simply not comparable to that of physicians, nurse practitioners, and physician assistants in terms of quality and quantity.

NDHA supports licensure of healthcare professionals within the scope of their training. Naturopaths, however, are not trained to prescribe medications safely and effectively. Patients can easily be misled into thinking that an ND license is the same as an MD, especially if naturopaths are allowed to prescribe medicine without sufficient medical training. We also have concerns that the licensing board regulating naturopaths does not have the necessary expertise in the areas of prescriptions to be able to ensure proper regulation.

We oppose this bill and ask that you give this it a **Do Not Pass** recommendation.

I would be happy to try to answer any questions you may have. Thank you.

Respectfully Submitted,

Melissa Hauer
General Counsel/VP