

House Human Services Committee
SB 2274: March 23, 2021

Mr. Chairman and Members of the hard-working House Human Services Committee. North Dakota has a handful of Naturopathic Doctors, 8 to be exact. And a few more who would like to come to North Dakota if we pass this bill. In Montana, Docs embraced Naturopathic medical practice, and they have 75 practicing Naturopathic Doctors with full prescribing authority for Schedule II, III, IV and V drugs.

Health care is a major issue in our country and state, and is the subject of SB 2274.

1. First, health care costs, and health care insurance premiums, are a major issue for our state and country. THIS BILL WILL HELP WITH HEALTH CARE COSTS.
2. Second, we are continually striving to provide better access to health care, including our Native Americans. THIS BILL WILL ALSO HELP WITH BETTER ACCESS TO HEALTH CARE.
3. Third, I think there is a consensus that we Americans could be healthier. Naturopathic primary care physicians are trained in both natural and conventional approaches to prevent disease, treat acute illness, and manage or reverse chronic health conditions. THIS BILL WILL HELP US ACHIEVE HEALTHIER OUTCOMES.

The bill was amended in the Senate to exclude all Schedule II through V drugs, except testosterone from Schedule III, and Legend Drugs, such as antibiotics.

There have been some concerns expressed I would like to address.

1. The first concern is that Naturopathic Doctors are not educated in pharmacology. Attached to my testimony is the list of medical school courses that are required to be certified and licensed as a Naturopathic Doctor. These courses are comparable to other doctors.
2. The next concern is that Naturopathic Doctors do not have any clinical experience and training in pharmacology. Again, if you look at the materials, you will see extensive education, clinical training and experience in pharmacology.

3. The next concern is that this bill is not safe. The safety record of Naturopathic Doctors in those states that allow full prescription authority is impeccable. Those Naturopathic Doctors have the same relationship with pharmacists as other doctors, which is collaborative on any medications that are prescribed.

In summary:

1. By allowing a greater scope of practice as provided in this bill, Naturopathic Doctors can ENHANCE ACCESS to health care. We have a shortage of medical professionals, and this bill will provide more access to health care.
2. The foundation of Naturopathic Medicine is to utilize the most natural, least invasive and least toxic therapies for disease prevention. The limited prescriptions in this bill will save time and money for the patients of Naturopathic Doctors, and for all of health care.
3. As for Americans being healthier, Naturopathic medicine emphasizes disease prevention, so there is extensive training to help people make lifestyle changes in support of their personal health.

In Montana, the medical establishment has embraced Naturopathic medical care, rather than try to exclude this area of medicine. As a result, Naturopathic Doctors can prescribe all Level II, III, IV, and V drugs, and there are 75 practicing Naturopathic Docs. The safety record of these Montana Naturopathic Doctors is exemplary. And many of Montana's Naturopathic Docs serve Montana's rural areas. In some cases Medical and Naturopathic Docs have their practices together. I believe Montana's approach of encouraging Naturopathic Medical care provides better health care for its people.

Finally, if you look at the map of states that have licensure, have authorized prescriptions, or have authorized primary care privileges, you will see that this area of medical practice is growing.

For issues of health care costs, better access, and healthier Americans, I urge a Do Pass on SB 2274. Thank you.

Naturopathic Doctor Education Comparison

	Both prescribing providers in ND		NATUROPATHIC DOCTOR	ALLOPATHIC DOCTOR
	PHYSICIAN ASSISTANT	NURSE PRACTITIONER		
YEARS OF UNDERGRADUATE MEDICAL EDUCATION	4 Years	4 Years	4 Years	4 Years
LENGTH OF PROGRAM	2 Years	4 Years	4 Years	4 Years
CLASSROOM & ONLINE INSTRUCTION	13 Months	2 Years	2 Years	2 Years
AVERAGE CREDITS FIRST TWO YEARS	88	63	130	91
CLINICAL TRAINING (BEFORE RESIDENCY)	Primary Care in 30 Weeks + 16 Weeks Specialty	1020 Hours	143.5 Credits 1578 Hours	148 Credits 1632 Hours
CLINICAL SUPERVISION	46 Weeks	2 Years	2 Years	2 Years
PHARMACOLOGY CREDITS	4	5	6	8/10
NUTRITION & LIFESTYLE CREDITS	0	2	12-20	0-4

American Association of Naturopathic Physicians

Naturopathic Medicine is Safe

Each year since 2013, the United States Congress has recognized the safety and efficacy of naturopathic medicine by designating the second week in October as Naturopathic Medicine Week. The resolution recognizes the “value of naturopathic medicine in providing **safe**, effective, and affordable health care” Available data backs this assertion. The incidence of malpractice claims made against Naturopathic Doctors in jurisdictions where they are regulated is exceedingly low, especially as compared to allopathic physicians, and disciplinary action against Naturopathic Doctors is exceedingly rare.

Naturopathic medicine is well-established. Of 22 states and territories where Naturopathic Doctors are regulated, licensure in five of them dates back to 1935 or earlier; in the others, Naturopathic Doctors have been regulated an average of 17 years.

In the 12 states that regulate Naturopathic Doctors prescribing rights, nine report **ZERO prescriptive disciplinary actions** against Naturopathic Doctors from 2010-2020*:

State:	Year of regulation:	Approximate # of regulated Naturopathic Doctors:	Total # of disciplinary actions against NDs in the last five years:
California	2003	1,001	0
Hawaii	1925	132	0
*Idaho	2019	19	0
Maine	1995	66	0
Montana	1991	97	0
New Hampshire	1994	88	0
*New Mexico	2019	<i>licensure in progress</i>	0
Utah	1996	62	0
Vermont	1995	338	0

*Idaho and New Mexico became licensed in 2019, therefore ten years of data is unavailable.

Source: 2020 Federation of Naturopathic Medicine Regulatory Authorities (<https://fnmra.org/>)

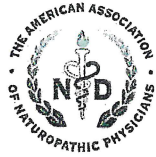
California is one of the more recent states to license Naturopathic Doctors, yet they've been licensed long enough to provide an excellent example of the safety records of Naturopathic Doctors post-licensure. California passed its licensure law in 2003 and began licensing Naturopathic Doctors in 2005. California's over 1,000 practicing Naturopathic Doctors have a pristine safety record:

➤ There have been **no cases of patient harm** caused by Naturopathic Doctors in California since the first licenses were issued in 2005 to date.

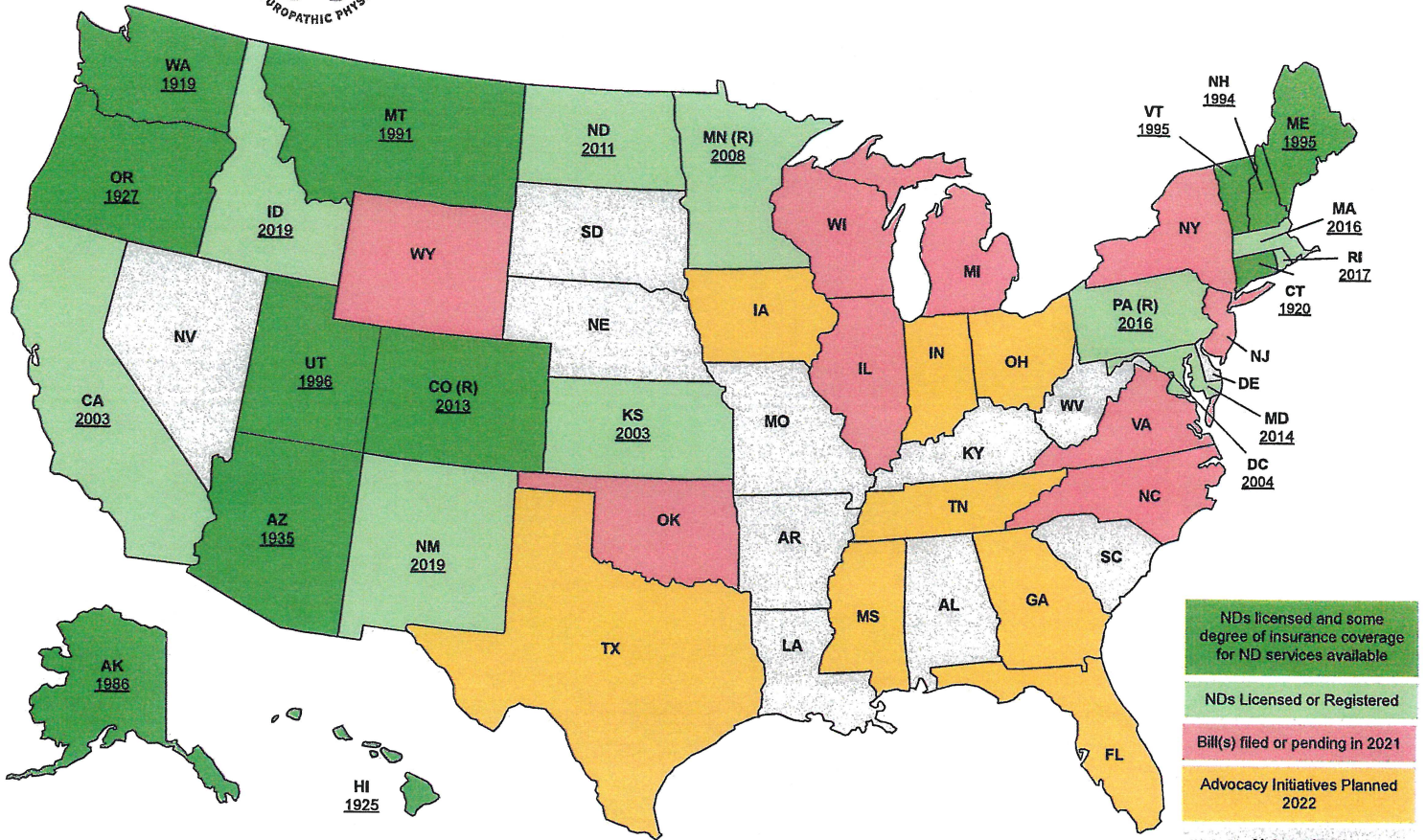
➤ Of 16,925 medical malpractice payments totaling more than \$2.7 billion made in California from 2002-2012, **none of them** were attributed to Naturopathic Doctors.

(Sources: California Naturopathic Doctors' Association, 2016; U.S. Department of Health and Human Services National Practitioner Databank).

Because of the exemplary safety record of Naturopathic Doctors, **malpractice insurance costs are low** for them. Average yearly malpractice premiums for Naturopathic Doctors practicing in full-scope states tend to be substantially lower – 30-40 percent less – than premiums for medical doctors and osteopaths.



Regulation of Naturopathic Doctors in the United States (Update 01/2021)



(R) = registered state.
 Year = year ND regulation passed.
 Regulated territories (not pictured): Puerto Rico (2004) and the US Virgin Islands (2001).