



**Senate Human Services Committee
SB 2274
February 1, 2021**

Good morning Chairman Lee and Committee Members. I am Courtney Koebele, executive director of the North Dakota Medical Association. The North Dakota Medical Association is the professional membership organization for North Dakota physicians, residents, and medical students.

The North Dakota Medical Association opposes SB 2274, which expands the scope of naturopaths to include prescribing, dispensing, administering, and procuring drugs and medical devices. Our concerns focus on patient safety and quality medical care.

NDMA is in support of licensure of professions within the scope of their training. However, when professions seek to practice outside of their training, and thus endanger the safety of North Dakota patients, NDMA will object. Naturopaths are not trained adequately to prescribe. NDMA has further concerns that the board regulating them in North Dakota does not have the expertise in those areas to properly regulate and discipline.

Naturopathic schools do not have the same admission standards as medical schools. They do not require the MCAT or similar exam before admission. The admission rates are quite high for naturopathic schools.

Prior to becoming licensed, MDs and DOs take the USMLE. The United States Medical Licensing Examination (USMLE) is a three-step examination for medical licensure in the United States. Naturopaths take the NPLEX. The NPLEX, the naturopathic licensing exams administered by the North American Board of Naturopathic Examiners (NABNE), is written entirely by naturopaths and not made publicly available like the USMLE for MDs and DOs. The NPLEX continues to be kept confidential by NABNE, not allowing independent verification to assess the quality of the licensing examinations and to assess claims that the exams are as rigorous and comprehensive as the USMLE.

A naturopathic graduate, Ms. Brit Hermes, has submitted written testimony on this bill. In that letter, Ms. Hermes makes several points against further expansion of naturopathic scope. It is quite lengthy and it makes some important points. For example, Ms. Hermes, a 2011 Bastyr graduate, points out the lack of clinical training compared to any other traditionally trained health practitioners. Ms. Hermes breaks down what the 1,200 hours of clinical training means for naturopathic doctors. She states that her clinical training included a very small amount of pharmacological experience.

The comparison of pharmacological training of naturopaths to nurse practitioners and physician assistants is also not correct. On page 6, Ms. Hermes states that naturopathic clinical training is in fact far less than physicians, nurse practitioners and physician assistants.

NDMA respectfully requests a DO NOT PASS on SB 2274. Thank you for your time today. I would be happy to answer any questions you may have.