

SB 2274 Naturopathic Scope Bill
Tonya Loken, ND, MS, RN, BSN
Senate Human Services Committee
February 1, 2021

Good morning Madam chair and members of the committee. My name is Dr. Tonya Loken and as practicing naturopathic doctor for the last four years and now a family nurse practitioner student, I am very equipped and educated to speak to the competency and preparation of the naturopathic doctor to take on the role of a prescribing provider.

My naturopathic medical school education was a four-year post baccalaureate doctoral degree. The naturopathic doctoral curriculum included basic science courses like anatomy, physiology, genetics, and biochemistry. These courses are most often taken by other doctoral level programs such as the medical doctor, osteopathic doctor, optometrist, and dentist. Clinical science courses included three pathology courses, four laboratory interpretation and diagnostic courses, four physical exam courses, four clinical diagnosis courses, three pharmacology courses and three diagnostic imaging courses. These courses prepare the naturopathic doctor to recognize the disease process, diagnose, and begin to learn the appropriate treatment for each disease and syndrome. The pharmacology training a naturopathic doctor receives includes three separate course which discuss the mechanism of action, drug safety, proper monitoring, appropriate prescribing and deprescribing, contraindications, and drug herb interactions. In addition, body systems courses such as endocrinology, cardiology, gastroenterology, gynecology, and ear, nose and throat allowed us to take a deep dive into the pathology and associated pharmacology treatment that would be appropriate for each system. These body systems courses prepared us to better understand how each drug would interact within that system and what effect it would have when given with another drug.

These rigorous courses prepared me for the fifteen hundred hours of direct patient care that I completed over the last two years of my education. During those patient contact hours, I assessed,

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ordered the appropriate tests, and prescribed or deprescribed the proper pharmaceutical treatment for my patients under the guidance of our attending physician. The extensive coursework and hands on practical experience should be evidence enough to convince you of the naturopathic doctor's ability to be a safe and effective provider. The same or more coursework, patient contact hours, and board exams that our other colleagues who are physician assistants and nurse practitioners have and are allowed prescriptive authority. However, despite my comprehensive training, I am unable to prescribe as a naturopathic doctor in the state of North Dakota.

Because I see the value in all the tools I have been trained to use, pharmaceuticals being one of them, I knew I needed to find a way to use them in my practice, to better serve my patients. I decided to obtain another degree, one which the law recognizes as able to prescribe pharmaceuticals, my family nurse practitioner degree. Because I wasn't a nurse already, I had to obtain my RN degree first. I then went to get my bachelor's degree in nursing and now I am just four months shy of graduating with my family nurse practitioner degree which will allow me to be a fully licensed, primary care provider that can prescribe pharmaceuticals. My other colleagues who practice in this state and the others that are sure to follow should not have to obtain two degrees to practice to their full training.

The course work for my family nurse practitioner degree has given me even more confidence in my education as a naturopathic doctor. My nurse practitioner education has been a great review of many of the concepts I learned while in naturopathic medical school, however I can confidently say it has not advanced my diagnostic skills, pharmacology knowledge, or my assurance in prescribing beyond what I have developed in my naturopathic medical training.

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My nurse practitioner education, which is standardized across schools to ensure a similar level of competency for boards has been less comprehensive than my naturopathic medical degree. In my nurse practitioner education, I will have had two pharmacology courses, zero lab diagnosis courses, one physical assessment course, and no diagnostic imaging courses by the time I am ready to sit for my board exam. Additionally, my patient contact hours will be a third of what I was required to have in naturopathic medical school, and my school requires more than what the minimum requirements are to be compliant and sit for your board exams.

Other professions in the state of North Dakota including dentists and optometrists are also afforded prescriptive authority with less training in pharmacology than what my colleagues and I received in naturopathic medical school. The discrepancy in who is allowed to utilize their training to its fullest is frustrating, knowing that my naturopathic education is more complete.

I hope this helps clarify why my colleagues and I continue to advocate for ourselves, our education, and all naturopathic doctors that wish to come to our state and use their full scope of knowledge and tools to treat their patients. We have as much training as our colleagues in other professions that are able to prescribe yet we have not been afforded the opportunity to use our education to its fullest. My ask today is that you understand how expansive the training and education is of the naturopathic doctor and help us add prescriptive authority to our scope of practice.