

Beth Allmendinger
SB 2274 – Naturopath Licensure
House Human Services Committee
March 23, 2021, 9:00 AM

Good morning Chairman Weisz and members of the committee, for the record my name is Beth Allmendinger (Lobby #1075) and I am here on behalf of the North Dakota Association of Naturopathic Doctors. I am also a practicing naturopathic doctor here in Bismarck, ND. I am a North Dakota native and attended NDSU for my undergraduate education. I returned to ND after we were licensed in 2011.

SB 2274 was introduced on our behalf, and I have been asked to explain the bill. Our licensure statute was created in 2011 and has not been amended since its inception. This bill seeks to add qualified, prescriptive rights to the naturopath licensure. I say qualified, prescriptive rights, as this request is specific to authorize only those licensed naturopath doctors who have successfully completed their 4-year undergraduate degree with pre requisite science courses, a 4-year graduate naturopathic medical degree in addition to passing a two-step national board exam.

Bill Review

I will now go through each section to explain the changes and rationale.

Page 1 - Section 1 (Line 9) 43-58-08 defines the scope of practice for naturopaths.

Section 1 defines what a naturopathic provider can't do. Previously, we could not prescribe drugs and this change allows us to prescribe drugs according to subsection 3.

Page 2 Subsection 3

(Line 2-6) Part a & b defines what naturopath can prescribe.

This includes medical equipment, drugs, nutrition and support services such as physical and occupational therapy.

(Line 7-9) Part c is specific to the pharmaceutical portion.

This includes all legend drugs. We amended the bill on the Senate side to remove schedule I-V substances, except testosterone.

(Line 10-11)

This clarifies that we cannot dispense medication unless its an emergency, such as an Epi pen, or if it's in the best interest of the patient or pharmacy services are not available

(Line 12-14)

Allows of distribution and access to professional pharmaceutical samples within our scope.

(Line 15-17)

Requires naturopaths to comply with federal and state guidelines pertaining to controlled substances. This would include having a DEA number.

We are seeking this authorization in our licensure to give confidence in safety and distinction in our industry as there are individuals who call themselves naturopaths in other states that do not have this level of education, and they are not eligible for licensure in our state.

You may hear from our opposition that we aren't science based. That is incorrect. Our first two years of naturopathic medical school are spent learning sciences. We have more science classes than NPs and PAs and the same as MDs. Dr Tonya Loken will be speaking about this in more details and providing comparison charts.

We rely on up-to-date research for diagnosis and treatment of our patients. Many Naturopathic doctors participate in research all over the country. Some are leading researchers in places such as National institute of Health (NIH), Department of Defense, MD Anderson and Fred Hutch cancer centers.

I would like to address some commonly misunderstood perceptions about naturopath regulation:

1. In the past it has been argued that the Board of Integrative Health Care cannot properly regulate Naturopath Doctors.
 - When we were attaining licensure, we requested to be under the Board of Medicine. They refused. Legislators created the BIHC with an MD, NP, pharmacist, and a representative of each profession on the board to oversee us and other professions that didn't quite fit under other boards. Now that board has 4 professions with over 100 licensees that it regulates. It works well and they are fully functional and capable of continuing to regulate us. However, if this addition not satisfactory to include prescriptive rights, we would be very open to a conversation about changing the oversight to the Board of Medicine.
2. There has been discussion about naturopaths not working within the allopathic (MD) setting or not being trained with that standard of care.
 - This is incorrect. Some of our instructors are MDs. The previous Dean of Bastyr's Naturopathic program was an MD. Our textbooks are the same as MDs. We have clinic shifts in hospitals and integrated practices. We precept with MDs. We qualify to match for MD residencies. Naturopath Doctors work in integrated clinics, local hospitals and federal hospitals such as the VA. They work along side MD's at Cancer Treatment Centers of America. Some naturopaths teach at allopathic medical schools. Our board exams are based on allopathic standard of care. In the at least 7 states where we are licensed as Primary Care Providers, we have to adhere to allopathic standard of care in our assessment and treatment of patients.

There are testimonies from MDs and other prescribers that have worked directly with naturopaths and can confirm our knowledge, training and safety. Some have even done rotations at naturopathic schools and have first-hand knowledge of our training. I understand how MDs would be concerned about patients' safety with prescribing. We take patients safety just as seriously. Many MDs don't know the details of our profession and training. You have received multiple testimonies of local and national practitioners that do and can speak to our abilities. Not only just our local Naturopath Doctors, but all naturopaths graduating from accredited schools.

We are different, yes. We are not MD's, nor are we trying to be. We are not surgeons, oncologists, cardiologists or ER physicians, nor are we trained to be. However, we are trained in primary care. The heavy focus of time and training in primary care has given us the skills and abilities to manage patients in a setting similar to a primary care setting. We also are trained to refer when something, such as cancer, is out of our training and scope.

We approach a patient's healthcare from a more wholistic viewpoint. We teach the patient about their current state of health, which includes answering the question of why they are on the prescriptions they are on. We take more time learning about the patient's overall health condition and all treatments they are doing. We are the only providers with extensive training on drug/herb interactions and with 75-86% of Americans on supplements this is now becoming a necessary skill when prescribing.

We are educated equally or more than other professions with these abilities in this state.

We are safe. Malpractice rates in multiple other states demonstrate this. Rates are generally 30-40% less expensive than MD's because our patient safety record is excellent.

Our patients, North Dakota citizens and your constituents are requesting this, and we can help alleviate the significant provider shortage that North Dakota faces.

There are North Dakota natives that want to come back and practice here using more of their training.

We take our professions tenant of First, Do No Harm very seriously.

I have included handouts on naturopathic safety information and an overview of ND, MD/DO and NP medical training. Last night I emailed you a short, informative video about our education and profession that I encourage you to view if you haven't yet.

I strongly encourage a DO PASS on SB 2274. Thank you for your time and attention. I would be happy to answer any questions you may have.