

SB 2274 Naturopathic Scope Bill
Tonya Loken, ND, MS, RN, BSN
House Human Services Committee
March 23, 2021

Hello, 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 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. 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. In addition, body systems courses such as endocrinology, cardiology, gastroenterology, gynecology, and ear, nose and throat courses allowed us to take a deep dive into the pathology and pharmacological treatment that would be appropriate for each system.

The pharmacology courses taken by naturopathic doctors are not unique to our profession in anyway. In fact, these courses taught my colleagues and I the same drugs that I learned about in my nurse practitioner training, and without a doubt, the same drugs that were taught to our medical doctor, and physician assistant colleagues. The pharmacology training a naturopathic doctor receives includes multiple courses which discuss the mechanism of action, drug safety considerations, proper monitoring, contraindications, and drug herb interactions. These courses helped prepare us to better understand how each drug would interact within that system and what effect it would have when given with another drug.

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These rigorous, comprehensive medical courses prepared me for the fifteen hundred hours of direct patient care that I completed over the last two years of my education and was then tested on during my second national board exam. During my patient contact hours, I assessed, ordered the appropriate tests, and prescribed or decribed the proper pharmaceutical treatment for my patients under the guidance of our attending physicians. 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. However, despite this 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. I decided to obtain another degree, one which the law recognizes as able to prescribe pharmaceuticals. I chose to get 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 three 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 numerous more 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 developed in my naturopathic medical training.

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Other professions in the state of North Dakota including physicians assistants, 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 so comprehensive.

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.