

SB 2274
Senate Human Services Committee
Senator Judy Lee, Chairman
Feb. 1, 2021

Chairman Lee and members of the Senate Human Services Committee, I am Chris Meeker, M.D., a board-certified emergency medicine physician and chief medical officer at Sanford Health in Bismarck.

I am submitting testimony in opposition to Senate Bill 2274 relating to the regulation of naturopaths.

By definition, naturopathy is an alternative form of healthcare based on the theory that diseases can be successfully treated or prevented *by vis medicatrix naturae*, or the healing power of nature. This is based on the prescientific idea of vitalism, or life energy. Its foundation lies in the belief that the body has the innate ability to heal itself if balance is restored. Naturopaths share some common beliefs with science-based medicine, including the promotion of healthy lifestyles, diet, nutrition and prevention of disease, however, they also use modalities that have no evidence to support their use, including detoxification, hydrotherapy, chelation, enemas, and, most importantly, homeopathy.

As such, most states do not license naturopaths and only a few allow prescribing authority for legend and controlled medications. Exceptions include authority to prescribe birth control and the hormones oxytocin and Pitocin.

SB 2274 expands a naturopath's scope of practice into dangerous territory—allowing naturopaths to prescribe medications they are not qualified to administer and perform procedures for which they are not adequately trained. A typical curriculum includes 6 credits of basic pharmacology out of about 250 credits required to graduate. In contrast, the curriculum includes 13 credits of homeopathy, calling in to question the quality of pharmacologic education. Since their foundation, naturopaths have been firmly against the use of

pharmaceuticals to treat disease, so prescribing active pharmaceuticals represents a fundamental shift in naturopath practice.

I wish to be clear that this is not a turf war. Access to care in our rural state is a top priority for North Dakota healthcare providers and this legislative body. In my expert opinion, this is a discussion of science versus philosophy. The core practice of homeopathy is incompatible with known laws of physics, chemistry, biology, pathology and physiology. One cannot believe in homeopathy and the effectiveness of pharmaceuticals at the same time. As an example of homeopathy, consider *oscillococcinum*. This is a homeopathic product you can find on the shelves of most pharmacies used to treat respiratory infections and influenza. It is derived from duck liver and heart that is freeze-dried, processed and then diluted. It is listed as a 200C product, which means it has been diluted at a ratio of 1 part duck to 99 parts water, 200 times. To put that in perspective, that means that there is 1 part remaining duck liver and heart in 1 with 400 zeroes behind it part water. There is only 1 with 100 zeroes molecules in the universe. In other words, there is zero percent chance that any of the original product is left. It is water. Either you believe that active ingredients matter or you don't. Anyone who practices homeopathy is not qualified to prescribe medications.

SB 2274 opens the door to prescribing medications that will harm patients when not used appropriately. Excluding controlled substances from classes I-IV only addresses medications with abuse potential; the proposed amendment puts in play medicines with the potential for harm—antibiotics, antivirals (including those for hepatitis C and HIV), antineoplastics (chemotherapy), anticoagulants (heparin, Coumadin, eliquis), cardiovascular drugs (such as antihypertensives, antiarrhythmics and statins), central nervous system agents (seizures, antidepressants, Parkinson's disease), insulin, testosterone, human growth hormone (HGH) and immunosuppressants. Even class IV chelation medications, known to have caused deaths of children, are not excluded. Relying on a small board of integrative health to define what medications are within the scope of a naturopath in no way protects the public.

The FDA's Adverse Event Reporting System (FAERS) already registers more than one million adverse drug reactions in patients prescribed medications by people with significantly more science-based education than naturopaths. Expect that to increase if naturopaths are granted broad prescribing privileges.

SB 2274 also adds "minor office procedures" to a naturopath's scope of practice. Any invasive medical procedure should be performed only by those capable of managing all potential complications. Even superficial lacerations could include complexities beyond the naturopath's skillset. Consider a dog bite to a child's face. Superficially, this may seem like a straight forward problem requiring a simple procedure to repair. It's deceptively complex, however. Should the wound be closed now, delayed, or not closed at all? Does it require antibiotics, and, if so, which one? Does it need a flap? Does it require a rabies immunization or immunoglobulin? Studies show that people who see naturopaths are vaccinated for all diseases at rates lower than the general population. What testing or observation is required of the dog?

Naturopaths are seeking expanded scopes of practice across the U.S. with varying degrees of success. Currently, 22 states have licensed naturopaths; at least three have specifically made the practice of naturopathy illegal. Only a fraction of the states that license naturopaths allow them to prescribe. The intent of the naturopathy lobby is to emulate the practice model for naturopaths in Oregon, where they've been given full prescriptive authority, including controlled substances, and hold themselves out as primary care physicians. Under current naturopathy provider licensing, naturopathic treatments are unlikely to cause harm. This bill would change that safety profile significantly, inevitably resulting in patient harm. I encourage you to vote no on SB 2274, effectively requiring those trained in naturopathy to practice only naturopathic medicine.

Thank you for your consideration.

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