

Dear Senator Lee,

My name is Grant Syverson, and I had the opportunity to meet you when I was the “Doctor of the Day” at the state capitol for the North Dakota Medical Association (NDMA). I am a pediatric rheumatologist serving the children of North Dakota and the legislative advocate for the North Dakota American Academy of Pediatrics (NDAAP). I am writing to you to voice my strong opposition to Senate Bill 2274 which seeks to allow naturopaths the ability to prescribe prescription medications and initiate therapeutic interventions including blood products. The North Dakota Board of Medicine (NDBOM), the North Dakota Hospital Association, and the NDMA have already submitted excellent written and oral testimony in opposition to this bill.

As a pediatric subspecialist I have a unique perspective on this issue as I have had to not only undergo the typical training for a pediatrician (4 years of medical school and 3 years of residency) I had to have an additional 3 years of training just to reach the necessary level of competency to independently care for my patients as a licensed practitioner. Naturopaths have none of this specialized training, are not trained in the medical model and yet, would be able to independently prescribe serious immune suppressive and life-threatening therapeutics. I am aware that amendments have been proposed which would limit this prescriptive practice to testosterone and all legend drugs. Legend drugs are defined by the board of pharmacy as a drug which, under federal law, is required to be labeled as a prescription drug and is restricted to use by licensed practitioners only. Some legend drugs that I prescribe are prednisone, chemotherapy (methotrexate, cyclophosphamide), and specialized therapies for juvenile arthritis, systemic lupus, vasculitis, and inflammatory muscle diseases. The list of legend drugs could go on and on but, ultimately any prescription medication can be dangerous if prescribed incorrectly. Neither myself nor any of my physician, nurse practitioner, or physician assistant colleagues would consider prescribing these therapies outside the scope of our training, as doing so without proper training would be unethical and considered malpractice.

So please, on behalf of myself and the membership of the NDAAP, vote **do not pass** on SB 2274. Naturopaths do not have the appropriate training, oversight, or clinical experience and the risk of harm to the children and adults of North Dakota is too great. Please feel free to give me a call or email to discuss further.

Thank you for your time,

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