

HB-1352 poses a danger to the public. If this bill passes, it will give the public the false impression that Naturopathic Doctors (NDs) are capable of using these medications appropriately.

1.) **PLAYING PHYSICIAN**

Colorado's recently registered NDs are on the road to pursuing *medical* privileges. They appear less engaged in naturopathy than seeking to become physicians without sufficient education and training. Indeed, the term "physician" frequently appears on their websites, though present law prohibits its use. Colorado NDs' lack of education, training, and appreciation for genuine science-based medicine makes them dangerous practitioners. While they equate their schools with medical schools, and their training and preparation as equivalent to that of medical doctors, that couldn't be further from the truth.

When practitioners are unable to make valid diagnoses, the question of permitting them to prescribe and administer even relatively benign medications should be **off the table**.

2.) **ALL ABOUT \$\$\$:**

A related goal is the acquisition of mandatory third-party reimbursements via PPACA's "non-discrimination" provision. The Colorado Association of Naturopathic Doctors has clearly stated this goal in their Summer 2010 newsletter:

"Naturopathic doctors in licensed states will not be a part of major insurance offerings.... This provision opens the opportunity for millions of Americans to access quality primary care from licensed naturopathic doctors."

But NDs will need to be "full service" in order to be considered part of a medical home.

3.) **DANGEROUS, OUTDATED & CRUEL**

NDs equate their national "boards" exam with medical boards, but evaluation by outsiders has not been possible until this year when a Maryland Naturopathic committee put into the public domain over 60 of the 2013 *NPLEX Study Guide* questions (2013). Although these particular questions/answers were no doubt put forth to impress Maryland physicians, they reveal out-dated information, superficial knowledge of critical conditions, and invalidated approaches that could easily result in fatalities, and has. Note several cases where patients have difficulty breathing and the

"correct" answers would do nothing to address these critical conditions. In other cases, people in distress would be given nothing but a placebo for relief; those with potentially serious conditions requiring immediate medical intervention are instead diagnosed with a "qi deficiency."

From ***NPLEX Study Guide*** (2013):

[http://www.leg.state.co.us/CLICS/CLICS2015A/commsumm.nsf/58e6d054c29cbe1287256e5f00670a70/cc2547974fd82e0d87257dff00796715/\\$FILE/150305%20AttachF.5.pdf](http://www.leg.state.co.us/CLICS/CLICS2015A/commsumm.nsf/58e6d054c29cbe1287256e5f00670a70/cc2547974fd82e0d87257dff00796715/$FILE/150305%20AttachF.5.pdf)

4.) LITTLE PHARMACOLOGY STUDIES

The most prominent of naturopathic schools – Bastyr – has recently halved their required study in pharmacology from 55 to 27.5 hours. Other schools may follow suit. This is a fraction of what is required of other health care professions.

ND v NP v PA Education Comparison Chart:

	Educational Institution	Loc.	Pharmacology Hours	Homeopathy Hours	Botanical Hours	Manipulation Hours
<i>Naturopathic</i>	Bastyr University	WA	27.5*	88	132	203.5
	National College of Natural Medicine	OR	72	144	96	216
	University of Bridgeport	CT	72	144	144	315
<i>Nurse Practitioner</i>	Long Island University	NY	105	0	0	0
	Vanderbilt University	TN	115	0	0	0
	Ohio State University	OH	101	0	0	0
<i>Physician Assistant</i>	Satus University	PA	90	0	0	0
	Lincoln Memorial University	TN	90	0	0	0
	University of Utah	UT	120	0	0	0

Sources:

- <http://www.bastyr.edu/sites/default/files/images/pdfs/course-catalog/2013-14-catalog/Catalog-2013-14.pdf>
- http://www.ncnm.edu/images/academic/curriculum/2013-14_ND_4yr_winter.pdf
- <http://www.bridgeport.edu/academics/graduate/naturopathic-medicine-nd/curriculum-and-program-requirements/>
- http://www.lsu.edu/~media/Files/Brooklyn/Academics/Schools/Nursing/SON_StudentHandbook_2012-13.ashx
- <http://www.nursing.vanderbilt.edu/current/handbook.pdf>

*In 2012-2013 Bastyr University changed their naturopathic curriculum. The former program contained 55 hours of pharmacology training as reported by a Bastyr alumnus who graduated in 2011:
<http://www.sciencebasedmedicine.org/nd-confession-part-1-clinical-training-inside-and-out/>

Source: <http://www.naturopathicdiaries.com/naturopathic-scope-of-practice-expansion-killed-in-north-dakota/>

5.) NO STANDARDS OF CARE

Even the most benign of medications may cause harm in the hands of an ND because the practice of naturopathy has no standards of care. Vitamins, for example, are likely going to be administered needlessly, and where they are injected, the administration would be totally inappropriate, judging the potential harm against little or no benefit.

Patients will not be given adequate information for informed consent when NDs routinely market their nostrums with exaggerated and false claims, e.g. that homeopathics are efficacious and I.V. vitamins are appropriate treatment for cancer.

6.) REGULATION IMPOSSIBLE

With no professional standards of care, there can be no way to regulate NDs' use of medications.

NDs have not even been legally allowed to practice for one year yet, reportedly with 11 complaints filed already against fewer than 100 registrants. Initial rule-making is not yet completed. Even if one considers NDs valid practitioners, it is premature to be allowing more medical privileges when their first Sunset Review is still more than a year away.

7.) LACK OF SUPERVISION NEEDED TO PROTECT THE PUBLIC

California recognizes that NDs need the supervision of a physician to prescribe a limited formulary.

I urge you to set this bill aside. NDs need to prove themselves as safe, efficacious, and responsible before anymore privileges are granted.

Thank you for giving the matter careful attention.

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