

**Madison Brame**

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**From:** Gregory Nacarelli <drgnac@gmail.com>  
**Sent:** Friday, February 16, 2024 2:45 PM  
**To:** IRRC  
**Subject:** Regulation #16A-4953: Registration of Naturopathic Doctors

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Dear Chairman George D. Bewick and IRRC Members:

My Name is Dr. Greg Nacarelli. I am contacting you to voice my support for the regulation implementing the Naturopathic Doctors Registration Act (Regulation [#16A-4953: Registration of Naturopathic Doctors](#)). This regulation will allow Naturopathic Doctors in Pennsylvania to work with patients who can be assured of a Naturopathic Doctor's training, background and proper regulation. This final-form regulation also contains language that correctly distinguishes Naturopathic Doctors from other various lay practitioners in the Commonwealth. This was accomplished by the PA State Board of Medicine voting to strike section 18.907(b) of the regulation which the PA Association of Naturopathic Physicians has been supportive of.

I hope this is the first step in a series of steps to eventually provide Naturopathic Doctors with a full scope of practice concurrent with their education. Page 7 of the final form rulemaking states: "Based on a review of these requirements, the Board does not believe that the final-form rulemaking will place Pennsylvania at a competitive disadvantage in that the qualifications for licensure in each of these states (a degree in naturopathic medicine and passage of the national examination) are essentially the same as the NDRA requires for the registration of naturopathic doctors in the Commonwealth"

The other states mentioned in this document offer naturopathic doctors a scope of practice. While I currently reside as a Naturopathic Doctor in the state of PA, I have been licensed elsewhere and until PA has a full scope of practice for a Naturopathic Doctor, I will remain licensed elsewhere. At this juncture, even with the passing of this regulation, PA will still be at a disadvantage compared to other states in terms of Naturopathic Doctors seeking licensure elsewhere, as they have been doing. Hopefully, PA will, more expediently than previously attempted, implement a full scope of practice bill for naturopathic doctors in the imminent future, as this may be a determining factor if I stay and practice in this state or not. For now, protecting my "title" will have to suffice, as will my being currently licensed elsewhere.

Sincerely,

Greg Nacarelli, N.D., Ph.D., M.S., C.N.G.S.