

33RD SENATORIAL DISTRICT

- SENATE BOX 203033
HARRISBURG, PA 17120-3033
PHONE: 717-787-4651
FAX: 717-772-2753
- 37 SOUTH MAIN STREET, SUITE 200
CHAMBERSBURG, PA 17201
PHONE: 717-264-6100
FAX: 717-264-3652
- 33 YORK STREET
GETTYSBURG, PA 17325
PHONE: 717-334-4169
FAX: 717-334-5911



Senate of Pennsylvania

DOUG MASTRIANO
SENATOR

January 14, 2022

This letter is in response to the State Board of Medicine's (Board) proposed regulation (**PA Bulletin 21-2112**) regarding the registration of naturopathic doctors, **16A-4953**.

While understandably the Board is diligent in its efforts to update the definitions of Board-regulated practitioners, in response to this matter, consideration must be given for naturopathic doctors who have obtained their degrees and certifications in naturopathy, which encompassed vigorous course of study, continuing education, and the establishment of a viable practice and reputation as a naturopathic doctor, from other schools not included in this registration.

According to the Board's proposed regulation below, if unamended, would be detrimental financially and professionally to the thousands of established naturopathic doctors and traditional naturopathic doctors who have practiced naturopathy for the last 100 years, many for generations.

§ 18.907 (relating to acceptable titles and professional designations by registrants and non-registrants; prohibited titles) the Board clarifies the acceptable titles that may be used by registered naturopathic doctors, as well as non-registrants who may hold themselves out as naturopaths, traditional naturopaths and similar titles. Section 201 of the NDRA (63 P.S. § 272.201) provides that "[i]t shall be unlawful for an individual to use the title of "naturopathic doctor" or "doctor of naturopathic medicine" unless that person is registered as a naturopathic doctor with the board." Proposed § 18.907 makes it clear that a naturopathic doctor who uses the designation "Dr." shall further identify himself or herself as a "naturopathic doctor," "registered naturopathic doctor" or "doctor of naturopathic medicine" and may not use any term or designation that implies that the naturopathic doctor is authorized to practice medicine or any other health care profession, unless the naturopathic doctor also holds a current and active authorization to practice the other profession issued by the appropriate licensing authority of this Commonwealth.

Given there is even a question concerning the General Assembly's intentions in the passing of Act 128 and this section, is reason enough to pause and revisit this issue. It is unconscionable to restrict current naturopathic doctors of their titles and use of the term "Doctor of Naturopathy" which is their livelihood in such a manner and without cause on their part.

COMMITTEES

GAME & FISHERIES, WILDLIFE

AGRICULTURE

INTERGOVERNMENTAL OPERATIONS

STATE GOVERNMENT

SENATORMASTRIANO.COM

FACEBOOK.COM/SENATORDOUGMASTRIANO/

TWITTER.COM/SENMASTRIANO

INSTAGRAM.COM/SENATORMASTRIANO/

RECEIVED

Jan 20 2022

INDEPENDENT REGULATORY
REVIEW COMMISSION

Agreeably, amending section § 18.907(b) in the proposed regulation to provide that “[a]n individual who has not registered with the Board may claim to be, and hold oneself out as, a naturopath, a traditional naturopath, **DOCTOR OF NATUROPATHY, OR N.D.** and use any similar title implying that the individual practices naturopathy **so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board**” is a reasonable compromise if the Board wants to move forward with this action.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Mastriano". The signature is stylized with large, sweeping loops and a prominent "M".

Doug Mastriano
State Senator, 33rd District