



January 4, 2022

Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

**RE: Support for Registration of Naturopathic Doctors; Comments Regarding Proposed Regulation 16-4953-ND**

Chairman George D. Bewick and respected IRRC Members:

The American Association of Naturopathic Physicians (AANP), the national professional association representing licensed Naturopathic Doctors (NDs), wholeheartedly supports registration of Naturopathic Doctors in Pennsylvania. We write to encourage adoption of Registration of Naturopathic Doctors, IRRC #: 3324, with the following supporting facts.

- **There is a distinct difference between the practice of “naturopathy” and the practice of “naturopathic medicine.”** Legislative intent clearly shows that this distinction is one of the reasons that compelled passage of the Naturopathic Doctor Registration Act (NDRA). One of the purposes of registration is to ensure that Pennsylvania citizens who wish to avail themselves of the services of a Naturopathic Doctor can be confident that if a practitioner uses the “ND” designation, he or she has achieved a uniformly accepted minimum threshold of educational requirements and has passed nationally recognized competency exams. In other words, that they possess the credentials needed to competently diagnose and treat illness safely and effectively.
- **NDs are properly trained to treat illness, which is the essence of practicing medicine.** NDs eligible for Registration in Pennsylvania are graduates of four-year, full-time, in-residence, doctoral level programs that are accredited by the Council on Naturopathic Medical Education ([CNME](#)), an accrediting agency [recognized by the U.S. Department of Education](#).<sup>1</sup> After earning an ND medical degree from an

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<sup>1</sup> For further information on accreditation by the U.S. Department of Education, see <http://www2.ed.gov/admins/finaid/accred/index.html>.

accredited naturopathic medical school, graduates must then sit for the Naturopathic Physicians Licensing Examination (NPLEX), passage of which is required to be eligible for licensure or registration in all jurisdictions that regulate the practice of naturopathic medicine.

- **Registering NDs will expand access to quality healthcare in Pennsylvania.** Since NDs are trained as primary care providers (PCPs), they can help address Pennsylvania's forecasted need for an additional 1039 (11%) increase in PCPs by 2030 to maintain status quo<sup>2</sup>. Registered NDs can help fill the gap.
- **Naturopathic Doctors are specially trained in preventing chronic conditions (diabetes, high blood pressure, cardiovascular disease, chronic pain, depression).** According to the 2021 State of Our Health published by the Pennsylvania Department of Health, in 2018, the most common cause of death in Pennsylvania was cardiovascular disease, with approximately 47% of PA residents living with one or more chronic diseases. A study published in the Canadian Medical Association Journal (2013) reported that one year of care under the supervision of a naturopathic doctor, using several interventions, including diet, resulted in a 3.07% reduction in 10-year Cardiovascular Disease (CVD) events compared to patients receiving only allopathic care. The same study found that after one year, naturopathic patients were 16.9% less likely to have developed metabolic syndrome<sup>3</sup>.

We appreciate the opportunity to share our comments and thank you for the work you all are doing to further the regulation process for NDs. A proper system of registration of NDs protects citizens by ensuring the safe practice of naturopathic medicine in Pennsylvania.

I would be glad to answer any questions you may have, and I can be reached directly at 202-849-6306. Thank you for your time and consideration.

Sincerely,



Laura Culberson Farr  
Executive Director

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<sup>2</sup> The Physician Shortage in Pennsylvania (2015), Joint State Government Commission General Assembly of the Commonwealth of Pennsylvania, Retrieved December 28, 2021 at <http://jsg.legis.state.pa.us/resources/documents/ftp/publications/2015-411-physician%20shortage%20report%204-20-2015.pdf>

<sup>3</sup> (Seely D, et al. "Naturopathic medicine for the prevention of cardiovascular disease: a randomized clinical trial." Canadian Medical Association Journal 185.9 (2013): E409-E416.)