



January 10, 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

Dear Chairman Bewick and IRRC Members,

On behalf of the Council on Naturopathic Medical Education (CNME), I am writing in support of the registration of naturopathic doctors in Pennsylvania.

The Council on Naturopathic Medical Education is the only U.S. Department of Education-recognized accrediting agency for Doctor of Naturopathy programs (referred to as “ND programs”). The CNME’s function as an accrediting agency is similar to that of the Liaison Committee on Medical Education (LCME), the U.S. Department of Education-recognized accrediting agency for MD programs. Also similar to LCME—which is composed of medical educators, medical doctors, medical students and public members—CNME is composed of naturopathic medical educators, naturopathic medical doctors and public members.

CNME-accredited Doctor of Naturopathy programs prepare students to become licensed naturopathic medical doctors. These programs are primarily residential, are a minimum of 4,100 hours in length, and typically require four years of full-time study to complete. The institutions of higher education in the U.S. that offer CNME-accredited ND programs are all also accredited by institutional accrediting agencies recognized by the U.S. Department of Education, and the ND degree is authorized by the respective state boards of education where the institutions are located.

The CNME has established high standards for the education of naturopathic medical doctors. Like conventional medicine, the practice of naturopathic medicine requires extensive knowledge and expertise—not only in natural approaches to healthcare, but also in the clinical and biomedical sciences typically taught in MD programs (e.g., pharmacology). The CNME’s educational standards are used directly or indirectly as a basis for licensure by the 22 states that license naturopathic doctors, as well as by the District of Columbia, Puerto Rico and the Virgin Islands. They provide assurance to the public—who are increasingly using integrative, complementary and alternative approaches to healthcare—that graduates of ND programs are safe and effective healthcare providers. For more information on CNME, please refer to our website: www.cnme.org.

COUNCIL ON NATUROPATHIC MEDICAL EDUCATION



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Registration for NDs in Pennsylvania will benefit everyone in the state: individuals interested in seeking integrative/natural healthcare approaches, Doctors of naturopathic medicine who currently live and practice in Pennsylvania or who would like to relocate to the state, and the overall community health and well-being of the state's residents.

Please contact me if you have any questions. Thank you for considering my comments.

Best wishes,

A handwritten signature in black ink, appearing to read "Daniel Seitz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Daniel Seitz, JD, EdD
Executive Director