



Shana Walter, Counsel
State Board of Medicine
P.O. Box 69523
Harrisburg, PA 17106-9523
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Dear Attorney Walter,

I am writing to offer my comments and suggestions to the State Board of Medicine's proposed regulation regarding the registration of naturopathic doctors.

I am a Naturopathic Doctor, who received a Doctor of Naturopathy degree after completing a vigorous course of study. I have used the title of Naturopathic Doctor and my degree, N.D., since graduation, in 2016, as have thousands of Naturopathic Doctors over the last 100 years. However, the State Board of Medicine's proposed regulations threatens my continued use of the title and degree abbreviation that I have earned and by which the public historically recognizes me and my colleagues by failing to expressly authorize the continued use of my degree, "N.D.", or the use of the term "doctor of naturopathy" in section 18.907(b) of the proposed regulation. In fact, we prefer not to be called Traditional Naturopaths, and before this regulation around the state we all have been practicing as "Naturopathic Doctors".

Naturopaths are holistic practitioners, who work hand-in-hand with medical doctors for the benefit of their clients. Traditional naturopaths educate their clients and teach them to assume responsibility for their own health and well-being. For example, traditional naturopaths educate their clients about the effect of nutrition on their clients' bodies and illnesses. Among other methods, traditional naturopaths help clients make informed choices about their lifestyle and the positive or negative effects of nutritional habits on their health.

Other than prohibiting the use of the terms "naturopathic doctor" or "doctor of naturopathic medicine," Act 128 does not directly affect traditional naturopaths. Act 128 does not limit a Naturopathic Doctor's scope of practice or use of the degree they have earned, Doctor of Naturopathy," or its associated abbreviation, "N.D." Act 128 identifies the qualifications necessary if an individual desires to register as a "doctor of naturopathic medicine" or a "naturopathic doctor." Nothing within Act 128 expressly

precludes a traditional naturopath's use of the title "Doctor of Naturopathy" or the abbreviation historically associated with it, "N.D."

In fact, review of the legislative history of Act 128, reveals that the General Assembly did not intend to preclude the use of "N.D." by unregistered traditional naturopaths. Earlier versions of Act 128 expressly prohibited the use of "N.D." by unlicensed traditional naturopaths. For example, section 506 of House Bill 612 of 2013, printer number 592, expressly prohibited unlicensed individuals using the abbreviation "N.D." and expressly authorized licensees to use it. The General Assembly retained the language in printer number 1053. However, in Act 128, the General Assembly removed the prohibition against an unregistered naturopath's use of the abbreviation, "N.D." as well as the express reservation of the use of "N.D." to registered naturopaths in contrast to earlier versions of the proposed legislation. Having directly considered the legislation of the use of "N.D." and having removed it from the final version of the enacted statute, the General Assembly clearly did not intend to prohibit the use of "N.D." by

Naturopathic Doctors, such as I, if the General Assembly had intended that the Board regulate who may use the abbreviation "N.D." it would have retained the language restricting its use that was in earlier version of Act 128.

However, the Board's proposed regulation creates uncertainty regarding other Naturopathic Doctor's, having completed doctorate degrees and Ph.D.s from other schools around the country and world. continued use of the degree that they have earned, "Doctor of Naturopathy." The Board's proposed regulation, if unamended, would have a significant financial impact as traditional naturopaths replaced signage and other forms of advertising to avoid the uncertainty created by the proposed regulations. My colleagues are already absorbing the financial cost of Act 128, which precludes their continued use of "naturopathic doctor" and the confusion that it has created among the public regarding its ability to continue seeing traditional naturopaths.

To avoid adverse financial consequences, confusion to the public, uncertainty among practitioners and to comply with the General Assembly's intent, I am requesting that the Board include the phrase "doctor of naturopathy" and the abbreviation associated with the degree I and other traditional naturopaths have earned, "N.D.", in section 18.907(b). The legislative history of Act 128 indicates that the General Assembly did not intend to restrict the use of "N.D." to just registrants with the Board. It is unfair to impose upon me and other traditional naturopaths the cost of removing all references to the degree that we have earned," in signage, contracts, stationary, and advertisements, and professional CEU's when it was another group who sought legislation seeking the recognition of state registration. Amending the proposed regulation in this fashion is consistent with the General Assembly's intent as discerned by a review of Act 128's legislative history.

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.”

Thank you for your time and consideration,

Dr. Rachel Bright, ND

Rachel L. Bright, ND
Doctor of Naturopathy
Board Certified Traditional Naturopath (ANMCB)
Certified Nutritional Practitioner
B.S. Exercise Science
Drrachelbright@gmail.com
www.brighthealthandwellness.com