

# 3324

**From:** ourhouse1@frontiernet.net  
**To:** ST\_RegulatoryCounsel; Barbara Myers  
**Subject:** [External] ""16A-4953 (Registration of Naturopathic Doctors)"" 1/3/2022  
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Shana Walter, Counsel, State Board of Medicine,

Dear Ms. Walter, Esq:

Besides being a ND who is Board Certified by the American Naturopathic Medical Association, before my pro bono practice of Naturopathy which I have done for over a decade, I was CFP and a Registered Investment Advisor (RIA). It appears that this proposal is similar to the regulations that govern RIA's on a medical level, instead of a financial disclosure level. While this appears to be a noble effort, a great deal of this was extensively discussed and deliberated by the medical oversight board concerning current legislation mandating that only Baystr educated ND's be allowed to utilize the term Naturopathic Doctor. That should have closed the issue and additional registration and legislation is not needed and could restrict and impair the practice of Natropathy in Pennsylvania. I am on the board of the Pennsylvania Traditional Naturopathic Association and was one of the wittessed who provided input to the medical oversight board.

If this were enacted and these ND's were registered, my concern is how oversight will be able to be implemented. In my practice as a CFP which I received in 1989 and practiced until about 2018 I had only been audited once, when I was part of the financial firm of Comprehensive Financial Planning, (now called Comprehensive Companies) in East Petersburg, Pennsylvania ! I would expect that the oversight to insure that these provisions are adequately implemented would be no better and could also be used to harras those of us who received our ND's as well as Board Certification by other means. Originally the CFP program was a correspondence and study group program and has grown to one of the most valued and highly recognized designations in the finacial advisory field. So it should be recognized that besides a four year college program their are other means of obtaining a naturopathic medical education and that the oversight of this is best done by the board certification program of the American Naturopathic Medical Association Board Certification program, which is also open to Byastr students but is rarely used.

At one time I felt that licensure and/or registration would be helpful to advance the practice and availability of the practice of naturopathic medicine. Seeing what is happening to licensed MD's and DO's during this period of COVID has caused me to change that opinon. I now feel that naturopathic medicine oversight is best implemented by a board certification program and not by licensing and/or registration.

Respectively submitted,

John L. Herr ND and former CFP