



**Pennsylvania Association of Naturopathic Physicians**  
Executive board of directors  
PO Box 208  
Harrisburg PA 17108

**January 18, 2022**

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

**RE: Registration of Naturopathic Doctors**  
**IRRC # 3324**  
**Agency #: 16A**  
**ID#: 4953-ND**

**Dear Chairman George D. Bewick and respected IRRC Members:**

On behalf of the Naturopathic Doctors working in Pennsylvania and our patients, we write to thank the IRRC for undertaking this review and to provide our support for the Naturopathic Doctors Registration Act (NDRA). This will allow Naturopathic Doctors in the Pennsylvania to work with patients who can be assured of our training, background and regulation. We would like to share several points critical to understanding naturopathic medicine. Secondly, we provide input and comments for the NDRA with due consideration for the citizens of Pennsylvania and in recognition of review done by the Pennsylvania Board of Medicine.

**ND's are educated and trained as health care providers via national standards.**

NDs eligible for registration in Pennsylvania are graduates of four-year, full-time, in-residence, doctoral level programs that are nationally accredited by the Council on Naturopathic Medical Education ([CNME](#)), an accrediting agency [recognized by the U.S. Department of Education](#). In earning an ND medical degree from an accredited naturopathic medical school, participants complete 2 years of biomedical sciences followed by 2 years of clinical sciences. This is comparable to MD programs except that ND programs also include additional education and training in nutrition, lifestyle counseling, botanical medicine, physical medicine, and other integrative therapies. Graduates must then pass the Naturopathic Physicians Licensing Examination (NPLEX), a requirement to be eligible for

licensure or registration in all jurisdictions that regulate the practice of naturopathic medicine. Following core competency exams, many ND's enter residency, fellowship or advanced clinical or research training programs. Pennsylvania will have a distinct advantage by including ND's as providers, adding to preventive health care services for people in the state. There are 4 states in the Northeast including Maine, Vermont, New Hampshire, and Massachusetts with current bills providing for NDs to practice as primary care providers. With over 200 graduates annually at each of 8 naturopathic medical schools, it would bring people and jobs to the state if naturopathic doctors were included as providers. It would also add resources in health care to the people of PA. NDs are trained in vaccination, preventive health screenings, and in ordering labs and imaging. ***NDs can expand access to quality healthcare in Pennsylvania.***

**There is a distinct difference between lay people using natural therapies 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 (ND) 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 and effectively provide health care. There are currently lay providers in PA who describe their work as "naturopathy" which is a traditional term for use of herbal or natural therapies by lay people. These lay providers are non-degree bearing and are sometimes working with the public to advise on natural therapies. Some of these providers call themselves "Naturopaths", "Naturopathic Doctor" or "ND". This legislation should include that the term "Naturopathic Doctor" and the post nominal designation "ND", are used by no other providers other than those who are degree bearing trained health care providers who have graduated from federally accredited schools of naturopathic medicine and who pass NPLEX board exams. ***These regulations will govern the practice of naturopathic medicine by naturopathic doctors who are graduates of 4 year federally accredited doctoral degree programs and who meet very specific educational criteria and uphold specific certifications and continuing education annually. We respectfully request consideration from the IRRC and the Board of Medicine to add the post nominals "ND" to section 18.907a. Lay providers are not defined or regulated by these standards and were not addressed in the Naturopathic Doctors Registration Act (NRDA). As such we respectfully request that section 18.907b be removed from the statute as it refers to lay people and not Naturopathic doctors.***

**In the review that was done pertaining to the regulatory status of NDs in PA, it was suggested that PA would not be at a disadvantage to enact this regulatory bill.** While this may be true, PA would be at a great advantage to make use of trained providers who are able to add to health care services for its commonwealth. NDs are trained as primary care providers via national education standards and are experts in preventive care. In states that license ND's, they can work actively in programs that benefit underserved populations or support state initiatives via the Medical Reserve Corps. Data also exists on how ND's have benefited states who license ND's. Please read more [here](#).

**We share our sincere thanks to the PA board of medicine, chief counsel, and Senior Committee ED for the House Professional Licensure Committee Marlene Wilson, who over the last six years have hosted the work and review on this regulatory draft with NDs in PA.** We agree with 18.903 adding a requirement for 3 hours of child abuse training. All states that license ND's require explicit annual continuing education credits along with current Adult and Child CPR, BLS and Child abuse education training hours. We also agree with 18.904 requiring 2 additional hours of child abuse training biennially for renewal of registration.

**As Naturopathic Doctors, we look forward to supporting public health care in PA.**

Naturopathic doctors provide patients with expertise in prevention, nutrition, behavioral and lifestyle medicine and have important up-to-date knowledge about drug-herb, drug-nutrient and drug-drug interactions. Naturopathic doctors are an important resource to the people and state of PA as health care providers.

Sincerely,

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