



Shana Walter, Counsel

State Board of Medicine

P.O. Box 69523

Harrisburg, PA 17106-9523

January, 10 2022

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 2008, 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."

does not also imply that the individual is a naturopathic doctor registered with the Board.”

Thank you for your consideration.

Dr. Lynn Feinman

A handwritten signature in blue ink, appearing to read "Lynn Feinman", with a long horizontal flourish extending to the right.

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