



From: danseitz@verizon.net
To: [ST, RegulatoryCounsel](#)
Subject: [External] comments on proposed draft regulations pursuant to the Naturopathic Doctor Registration Act
Date: Wednesday, June 21, 2023 9:28:33 PM
Attachments: [CNME Letter to the PA Board of Medicine re proposed naturopathic doctor regs - 2023.06.21.pdf](#)

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To whom it may concern,

Attached please find comments from the Council on Naturopathic Medical Education on the proposed draft regulations regarding registration of naturopathic doctors in Pennsylvania currently under review by the State Board of Medicine. Please feel free to contact me if you have any questions or would like more information from the CNME.

Thank you for considering our input,

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Shana M. Walter
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State Board of Medicine
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June 21, 2023

Dear Members of the Pennsylvania State Board of Medicine,

I am writing on behalf of the Council on Naturopathic Medical Education (CNME) to share some feedback on proposed regulations pertaining to the registration of naturopathic doctors in Pennsylvania.

First, I'd like to share some information about the CNME. The CNME is the only U.S. Department of Education-recognized accrediting agency for Doctor of Naturopathic Medicine programs (referred to as "ND" programs). CNME-accredited ND programs prepare students to become licensed naturopathic doctors. These programs are primarily residential, are a minimum of 4,100 hours in length—including more than 1,200 hours of supervised clinical training—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—a doctoral-level credential—is authorized by the respective state boards of education where the institutions offering CNME-accredited programs are located.

The CNME has established the highest and most comprehensive standards for the education of naturopathic medical doctors that exist anywhere in the world. 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. The CNME's educational standards are used directly or indirectly as a basis for licensure by the 23 states that license naturopathic doctors, as well as by the District of Columbia, Puerto Rico and the U.S. 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.

I am writing to provide input regarding the proposed regulation in Chapter 18, Subchapter M, Section 18.907(b), which states that:

An individual who has not registered with the Board may claim to be, and hold oneself out as, a naturopath or a traditional naturopath and use any similar title implying that

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the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board.

In order to adequately protect public safety and to ensure that patients can count on receiving effective naturopathic medical care, it is important to understand the differences in the training between naturopathic medical doctors who have graduated from CNME-accredited programs and individuals who are referred to as “traditional naturopaths” or “naturopaths” (and other similar titles). Basically, the difference are that: (i) there are no established educational standards for traditional naturopaths; (ii) the institutions that offer these programs are generally not regionally or institutionally accredited by U.S. Dept. of Education-recognized agencies; (iii) there are no legitimate programmatic accrediting bodies that oversee these programs; and (iv) there are no legitimate examination agencies that have developed a competency-based national naturopathic licensing examination for traditional naturopaths. In short, the field of traditional naturopathy lacks any of the external regulatory and quality control mechanisms upon which professional licensure/registration is nearly universally based throughout the U.S., and thus there is no way of ensuring the competency of practitioners.

While the CNME has no problem with individuals learning about natural medicine for their own informal use and for that of their family and friends, it is potentially problematic for Pennsylvania State Board of Medicine to specifically reference traditional naturopaths in regulations that are authorized under the Naturopathic Doctor Registration Act (Act of Nov. 3, 2016, P.L. 997, No. 128). Since there is no mention of traditional naturopaths in the NDRA, carving out an exception to that act in the naturopathic doctor regulations for this group of practitioners seems to go beyond the Board’s authority. Moreover, specifically referencing traditional naturopaths in the regulations may be seen as an endorsement by the Board of this field as being capable of providing safe and effective naturopathic care to the general public, despite the lack of educational and practice standards. Finally, the Board may be opening itself to adjudicating complaints from patients regarding possible harms caused by traditional naturopaths who lack the knowledge and skills to provide competent naturopathic medicine care. For these reasons, referencing traditional naturopaths in the regulations may result in adverse consequences to patients and an unintended regulatory burden being placed on the State Board of Medicine.

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