



**From:** [shannon@nabne.org](mailto:shannon@nabne.org)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 - Naturopathic Doctors ANFR  
**Date:** Tuesday, June 20, 2023 8:49:38 PM  
**Attachments:** [NABNE comments on 16A-4953 - Naturopathic Doctors ANFR.pdf](#)

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Please find the attached comments from NABNE16A-4953 – Naturopathic Doctors ANFR

Kind regards,

Shannon Braden, ND | Executive Director, [NABNE](#)  
North American Board of Naturopathic Examiners  
pronouns: she/her/hers  
503-452-2599 voicemail



June 20, 2023

RE: Comments on 16A-4953 – Naturopathic Doctors ANFR

**The North American Board of Naturopathic Examiners (NABNE)  
wants to clarify the differences between NABNE and  
the National Board of Naturopathic Examiners (NBNE).**

It has come to NABNE’s attention that the Pennsylvania Board of Medicine was provided a letter from Infinity Healthcare in response to draft regulations 16A-4953 – Naturopathic Doctors ANFR claiming that NABNE is not the sole entity administering the naturopathic medicine licensing exam. This claim is in error.

NABNE’s mission is to examine graduates of CNME-accredited naturopathic medical programs to ensure that they have mastered the competencies necessary to be safe naturopathic doctors (NDs). To fulfill its mission, NABNE administers the NPLEX Part I - Biomedical Science Examination and the NPLEX Part II - Clinical Science Examinations, which are the only board-level licensing examinations recognized by the regulatory authorities that currently license naturopathic doctors in the United States and its Territories.

As regulators, tasked with protecting the public, please be aware that the lay/traditional naturopathy profession has many organizations that try to mirror the ones in the licensed naturopathic medicine profession. This attempt at mirroring can cause confusion to regulators and the public alike.

NABNE is named in the Pennsylvania Naturopathic Doctors Registration Act.

NABNE and the NBNE may seem to be similar organizations at first glance; however, on deeper investigation, NABNE is clearly the only organization that is 1) named in all state statutes and rules, 2) accepted by naturopathic medicine regulators in other states, and 3) administers the NPLEX according to well-accepted industry standards, thus ensuring reliability and validity of exam results.

	North American Board of Naturopathic Examiners (NABNE)	National Board of Naturopathic Examiners (NBNE)
Established	1999	1951
Name of Licensing Exam Administered	NPLEX	NDLEX
Named in U.S. State Statutes and/or Rules	Yes <sup>1</sup>	No
Examinee results accepted by licensing/regulatory boards for licensure	Yes	No

<sup>1</sup> See addendum A for full list of regulated states and territories where NABNE/NPLEX are named in statute and/or rule.

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	North American Board of Naturopathic Examiners (NABNE)	National Board of Naturopathic Examiners (NBNE)
Examinee results reported to licensing/regulatory boards	Yes	No
Administered regularly	Yes, twice a year since 2000	No, on hold since pandemic (per NBNE website)
Examination administered in-person only	Yes	No
Licensing exam developed and administered according to well-accepted industry standards (similar to USMLE, COMLEX, NCLEX, etc.)	Yes	No
Eligibility requirement: graduation from CNME-accredited naturopathic medical program	Yes	No

The supreme court case *Wendel v. Spencer* (1954) referenced in the letter does not confer legitimacy on NBNE; it is simply named in the case. The decision was concerning the authority of Commission on Licensure to Practice the Healing Art in the District of Columbia (regulatory authority at the time) to determine the requirements for licensure when there was more than one national examining board. The supreme court decided that the Commission did have that authority and should exercise that authority to decide if it would accept one national examining board or both.<sup>2</sup>

Two distinct professions will be providing information to you:

- Lay/traditional naturopathy profession
- Licensed naturopathic medical profession

Licensed naturopathic medical doctors are faced with educating the public, regulators, and legislators about the differences – specifically to protect the safety of the public.

Licensed naturopathic medical organizations like CNME, NABNE, AANP, and ACCME:

- Train individuals in primary care medicine (diagnose and treat disease)
- Produce safe and competent naturopathic medical providers
- Use licensing examinations to provide proof of competency to practice safely
- Connect and provide information with state health care regulatory agencies
- Promote licensure to protect the safety of the public

<sup>2</sup> <https://law.justia.com/cases/federal/appellate-courts/F2/217/858/428790/>

Lay/traditional naturopathy organizations like NBNE, ANA, and ANMAB:

- Educate individuals to be health coaches, not primary care providers
- Produce practitioners who are unqualified to diagnose or treat disease
- Use examinations (NDLEX) to mirror the licensed naturopathic medical profession
- Unable to be licensed as an “Naturopathic Doctor” in any regulated state

In summary, lay/traditional naturopathy profession has many organizations and agencies that seem similar to the licensed naturopathic medical profession, but those organizations are not designed to produce competent primary care providers who are safe to practice on the public.

A handwritten signature in black ink, appearing to read 'S. Braden ND', with a horizontal line extending from the end of the signature.

Shannon Braden, ND Executive Director, NABNE

## Addendum A

### All States and Territories where Naturopathic Doctors are Regulated

NABNE and NPLEX in statute and/or rule by state		
State	NABNE named	NPLEX named
Alaska		statute
Arizona	statute	
California	statute	statute
Colorado	statute	
Connecticut		rule
District of Columbia	statute	statute
Hawaii		statute
Idaho	rule	rule
Kansas	statute	statute
Maine	rule	rule
Maryland	statute	
Massachusetts	statute	
Minnesota	statute	statute
Montana	rule	rule
New Hampshire	rule	rule
New Mexico	statute	
North Dakota	rule	rule
Oregon		rule
Pennsylvania	statute	
Puerto Rico		statute
Rhode Island		rule
Utah		rule
Vermont		rule
Virgin Islands		statute
Washington State	rule	rule