



Pennsylvania State Board of Medicine  
ATTN: Shana M. Walter, Board Counsel  
P.O. Box 69523  
Harrisburg, PA 17106-5923

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

Dear Pennsylvania Board of Medicine,

Thank you for your current work on the proposed draft of 16A 4953 - the Naturopathic Doctors Registration Act (NDRA) (63 P. S. §§ 272.101—272.301). We are glad this is moving forward and for your response to previous comments by the IRRC.

The Pennsylvania Association of Naturopathic Physicians (PANP) has reviewed the proposed draft in detail. We have coordinated with our national organization, AANMC, and we agree with their concerns. We also want to highlight our specific concerns to you below. One area with a potential clerical error we would like to point out is that 18.903 section 5 (a) lists a requirement for child abuse education as 3 hours whereas further on in section 18.905 section 6 it is listed as a requirement of 2 hours.

The biggest area of concern is that 18.907 section (b) addresses lay / traditional providers and was not part of the original language in Act 128 of 2016 which was passed by legislators. We ask that this be struck.

It is a public safety concern if lay or traditionally trained providers call themselves “naturopaths” as that represents to the public that they may be doctoral degree-bearing, medically trained providers. They are not. The NDRA was enacted to regulate naturopathic doctors who have attended federally recognized programs of post-graduate education and received advanced clinical training in naturopathic medicine during a 4 year, in residency, medical education whose criteria is defined by CNME - the accrediting body for doctoral programs in naturopathic medicine.

At past PA board of medicine meetings when the NDRA was discussed, a paid consultant for lay providers attended and caused confusion and delay for the board and the NDRA which has taken years to resolve. The intent of the NDRA is not to limit lay providers in their work in any way, however, they should not be included in the NDRA as they are a separate and widely varying group of providers - with many holding certificates from mail-in educational programs that are diverse.

**Again, for the safety of the public, and to avoid misrepresentation to the public, the NDRA should ensure that the terms “Naturopathic doctors” and “Naturopathic providers” are not used by lay providers and that no part of the NDRA includes lay or traditional providers.**

We are available to coordinate at any time prior to the July meeting and offer our support and resources should you need access to any information naturopathic-related. Attached please find our current state education materials for review.

Sincerely,

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