



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS  
STATE BOARD OF MEDICINE  
Post Office Box 2649  
Harrisburg, Pennsylvania 17105-2649  
(717) 783-7155



July 6, 2023

The Honorable George D. Bedwick, Chairman  
INDEPENDENT REGULATORY REVIEW COMMISSION  
14<sup>th</sup> Floor, Harristown 2, 333 Market Street  
Harrisburg, Pennsylvania 17101

Re: Proposed Regulation  
State Board of Medicine  
16A-4953: Registration of Naturopathic Doctors

Dear Chairman Bedwick:

Pursuant to section 5(c) of the Regulatory Review Act, 71 P.S. § 745.5(c), enclosed are copies of written comments received by the State Board of Medicine pertaining to Registration of Naturopathic Doctors following publication of the advanced notice of final rulemaking.

Sincerely,

A handwritten signature in black ink that reads "Mark B. Woodland".

Mark B. Woodland, M.S., M.D., Chairperson  
State Board of Medicine

MBW/smw:bmz  
Enclosure

cc: Arion R. Claggett, Acting Commissioner of Professional and Occupational Affairs  
K. Kalonji Johnson, Deputy Secretary for Regulatory Programs  
Andrew LaFratte, Executive Policy Specialist, Department of State  
Cynthia Montgomery, Deputy Chief Counsel, Department of State  
Jacqueline A. Wolfgang, Regulatory Unit Counsel, Department of State  
Marc Farrell, Regulatory Unit Counsel, Department of State  
Shana M. Walter, Co-Counsel, State Board of Medicine  
Dana M. Wucinski, Co-Counsel, State Board of Medicine  
State Board of Medicine



Shana M. Walter  
Board Counsel  
State Board of Medicine  
P.O. Box 69523  
Harrisburg, PA 17106-5923  
[RA-STRegulatoryCounsel@pa.gov](mailto:RA-STRegulatoryCounsel@pa.gov)

Jun 21, 2023

Dear Pennsylvania State Board of Medicine.

On behalf of the Association of Accredited Naturopathic Medical Colleges (AANMC), the membership organization for federally recognized programs of naturopathic medicine in the United States and Canada, thank you for the opportunity to provide feedback during the comment period regarding key terms and definitions and corresponding amendments incorporating the key terms, as well as amendments to address clarity and lack of ambiguity in the The Naturopathic Doctor Registration Act. This is the third opportunity for AANMC to share our recommendations and concerns with the PA State Board of Medicine. In addition to past issues, the following points are respectfully brought to your attention.

### **PUBLIC SAFETY**

We have historical knowledge regarding public confusion as it relates to use of 'traditional naturopath' and 'naturopath' by individuals who have not completed accredited training as recognized by the United States Department of Education. This distinction currently exists in the state of California and has created an untenable burden on the CA Board, including public confusion regarding education and scope of practice for naturopaths and naturopathic doctors. It is clear from California, and from litigation in states that are not yet regulated for the practice of naturopathic medicine, that the general public **does not** understand the distinction and lack of accredited or standardized training that people using 'traditional naturopath' fall under.

Further, many traditional naturopaths delve into the practice of medicine, using terms like 'Board Certification' when they have not met agreed upon board certification standards. This

creates an oversight issue for Medical Boards in that jurisdiction. In over ten years of service as executive director for the AANMC, I have been called upon countless times by state Attorneys General, and agents working on federal crimes, to distinguish the lack of standardized and validated education that these lay practitioners may or may not have completed, as government offices work on cases of public harm and fraud/deception. The patients and students, driven by genuine concerns, have unwittingly sought the assistance of these practitioners and participated in their programs, naively assuming that their education and training had undergone rigorous scrutiny and adhered to consistent and established educational standards. Regrettably, these practitioners have, in certain instances, developed examinations that lack psychometric validity and fail to encompass the necessary breadth for ensuring safe patient care.

The prevalence of public harm from ‘traditional naturopaths’ is increasingly a concerning issue. Compounding this is the fact that patients often find it challenging to discern between a graduate from a legitimate, four-year, in-residence, 4100 hour naturopathic medical program and an institution that lacks accreditation, commonly referred to as a "[diploma mill](#)." This lack of clarity poses significant risks to patients seeking effective and trustworthy healthcare options.

Furthermore, an alarming pattern emerges when examining numerous cases involving individuals who present themselves as naturopathy experts, despite lacking any uniform standard of education, professional ethics, background checks, or continuing education obligations. Disturbingly, several of the educational institutions associated with these individuals have been exposed as diploma mills and shell companies, leading to their closure. This absence of accreditation and oversight has resulted in serious allegations of fraud and, tragically, cases of patient fatalities. Such a lack of accountability highlights the urgent need for stronger regulatory measures to safeguard the well-being of patients seeking naturopathic care.

Taking into account the aforementioned concerns regarding public safety, it is highly advisable to include protective measures for the terms naturopath, traditional naturopath, naturopathic doctor, naturopathic physician, ND, NMD, and DNM within this regulatory framework. It is important to clarify that our intention is not to impede individuals who wish to utilize natural substances for the well-being of their immediate family members or themselves. However, it is crucial to recognize that the practice of naturopathic medicine is a distinct profession acknowledged by the United States and Canadian governments, and should not be conflated with the personal use of traditional medicines by private citizens. By establishing this distinction, we can ensure clarity and uphold the integrity of the naturopathic medicine field while safeguarding public understanding and safety.

The incorporation of traditional naturopath into this regulation extends far beyond statutory boundaries, imposing an unjustifiable burden on the Medical Board. This is glaringly evident from the alarming repercussions already witnessed in both California and other unregulated regions across the United States.

### **LIMITATION OF PROFESSIONAL ACTIVITY**

Serious consideration must be given to the inclusion of a provision that acknowledges the non-clinical and academic utilization of the naturopathic doctor (ND) educational distinction. Allow me to illustrate this through a personal experience. Roughly two decades ago, I was enlisted as an expert by Temple University to address the vital intersection of naturopathic medicine and HIV. However, as per the language in this regulation, if I were to be engaged as a consultant and operate within the state, I would be deprived of using my hard-earned professional title as a naturopathic doctor. It is imperative that we explore granting an exemption to individuals who fulfill the necessary registration criteria, enabling them to contribute to academia or non-clinical roles while retaining their well-deserved ND designation or ND (ret.). Failing to address this crucial aspect would undermine the recognition and utilization of naturopathic expertise in diverse interprofessional capacities.

### **POINTS OF CLARIFICATION**

- Clarification should be made regarding re-administration of the NPLEX examination if someone has been out of clinical practice for more than four years. This should state **NPLEX Part II**, which is the clinical component of the examination.

16A-4953 – Naturopathic Doctors March 20, 2023

demonstrating a passing score on the NPLEX **PART II** examination, completed within 12 months of the application to reactivate the registration.

- The term 'oriental' is widely regarded as pejorative and no longer appropriate. To mitigate the risk of legal challenges and allegations of biased language, it is strongly advised to replace it with terms such as Traditional Chinese Medicine or Asian Medicine. Embracing these more culturally sensitive and accurate designations will ensure respectful and inclusive communication while avoiding potential legal complications.
- 18.902 CNME—Council on Naturopathic Medical Education—The accrediting body which accredits schools **AND PROGRAMS** of naturopathic medicine for the education of naturopathic doctors.

- 18.903. Application for naturopathic doctor registration.  
(a) An applicant for a registration to practice naturopathic medicine shall submit, on an application made available by the Board, a completed application for a registration, including the necessary supporting documents and pay the application fee in § 16.13 (relating to licensure, certification, examination and registration fees).

**There is mention of licensure here, which is inconsistent with language surrounding registration.**

- 18.910 b) A naturopathic doctor who suffers from a physical, mental or emotional impairment, including substance abuse, that impacts the individual's ability to practice naturopathic medicine shall seek professional treatment and refrain from the practice of naturopathic medicine until the impairment no longer exists or reasonable accommodations can be made.

We recommend a thorough review of this document to ensure compliance with the Americans with Disabilities Act (ADA).

- In definitions 16.1: what is a drugless therapist and who would meet this definition?

Thank you for your prompt attention to the points brought forth. AANMC looks forward to receiving your response to our letter, and for ongoing dialogue regarding regulation of naturopathic doctors within Pennsylvania.

Respectfully,

JoAnn Yanez, ND, MPH, CAE  
AANMC Executive Director

Sandra Rogers, PhD  
AANMC Board President

**From:** [Kerri Allen](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR  
**Date:** Friday, June 30, 2023 2:54:47 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 5 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The General Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by

traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Kerri Allen

Kerri

**From:** [Rose Ann Barbato](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 - Naturopathic Doctors ANFR  
**Date:** Tuesday, July 4, 2023 12:47:07 AM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. This is allopathically oriented Doctor of Naturopathic Medicine (generally NMD) Act 128 of 2016, P.L. 997, allowed registration of these practitioners and gave them protection for the titles of "naturopathic doctor" and "doctor of naturopathic medicine".

These are not the kind of naturopaths whom I wish to consult. If I have an illness or an injury that needs diagnosis, I will see a qualified Doctor of Medicine (MD).

My naturapath is a traditional practitioner and is not required to register with the State.

It needs to be made clear that a traditional naturapath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of care would not know where to find it.

This could affect the income stream of naturapaths and force them to close their doors, affecting the health care of many PA Residents.

The State Board of Medicine has proposed regulations that would impair my healthcare:

1. SS 18.13a(e)
2. SS 18.15(d)
3. SS 18.902

Sincerely,  
Rose Ann Barbato



## Porta, Jason

---

**From:** shannon@nabne.org  
**Sent:** Friday, June 30, 2023 4:40 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 - Naturopathic Doctors ANFR  
**Attachments:** NABNE-NPLEX Comments on 16A-4953 - Naturopathic Doctors ANFR.pdf

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Please find the attached comments from NABNE regarding the NPLEX examinations.  
16A-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 28, 2023

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

Suite 119, #321  
9220 SW Barbur Blvd.  
Portland, Oregon 97219-5434

Phone: 503-246-0694  
info@nabne.org  
www.nabne.org

Board of Directors

Jami Kupperman, NMD

Angela Moore, ND

Kenneth Proefrock, NMD

Fraser Smith, MATD, ND

Susan Gragg

Executive Director

Shannon Braden, ND

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

Dear Board Counsel of Members of the Board of Medicine,

The North American Board of Naturopathic Examiners (NABNE) fulfills the necessary role of administering board-level examinations to qualified candidates.

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

NABNE appreciates this opportunity to comment on 16A-4953 – Naturopathic Doctors ANFR.

**Clarify 18.905(b) to specify which NPLEX exam will be required to demonstrate current competency**

The NABNE recommends that the Board clarify which of the NPLEX examinations are required to demonstrate current competency. The NPLEX Part II – Core Clinical Sciences Examination is the NPLEX examination that is designed to test minimal competency and safety to practice naturopathic medicine on the public. If the intent of the Board is to test clinical competency to safely practice on the public, then the Part II - Core Clinical Science is the NPLEX examination that should be named in the regulations.

NABNE suggests this change for 18.905 (b)

A registrant who has not had clinical contact with patients for 4 years or more shall demonstrate current competency and qualification to hold forth as a naturopathic doctor by demonstrating a passing score on **the NPLEX Part II – Core Clinical Science Examination**, completed within 12 months of the application to reactivate the registration.

NABNE thanks the Board for this opportunity to comment on the draft rules. Please contact NABNE if there are further questions.

Sincerely,

Shannon Braden, ND  
Executive Director, NABNE

## Porta, Jason

---

**From:** Tonda Brocco <lynnandmorgan@yahoo.com>  
**Sent:** Monday, July 3, 2023 9:43 AM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR.

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Dear Ms. Walter:

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More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that

he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

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Thank You for Your Consideration.

Sincerely,

Tonda Brocco

[Sent from Yahoo Mail for iPhone](#)

## Worthington, Amber

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**From:** erinfrenchy <erinfrenchy@gmail.com>  
**Sent:** Saturday, July 1, 2023 1:59 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR

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Dear Ms. Walter:

It is very important to my family that Doctors of Naturopathy be labeled as such. We moved here a few years ago and needed to find one, and that's how we differentiate between good natural doctors vs. the quacks.

We are clients of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

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The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’” By negative implication, only registered naturopathic doctors may use the abbreviation ‘N.D.’ This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation ‘N.D.’ This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

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Thank You for Your Consideration.

Sincerely,  
Erin Broersma

## Worthington, Amber

---

**From:** Joshua Brown <libertyislife@hotmail.com>  
**Sent:** Tuesday, July 4, 2023 6:20 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

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This could affect the income stream of naturopaths and force them to close their doors, thereby affecting the health care of many PA residents like me.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store would be liable to prosecution by the State.

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Thank You for Your Consideration.

Sincerely,

Joshua Brown  
336 Sleepy Hollow Rd.  
Smithfield, PA 15478-1252

**From:** [Peter N. Calcara](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Cc:** [Murphy, Miranda](#); [Murphy, Ashley](#); [Jennifer Cryder](#); [Peter N. Calcara](#)  
**Subject:** [External] PICPA Comment Letter--16A-5519 (SBOA)  
**Date:** Friday, June 30, 2023 7:37:56 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
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[PICPA Comment Letter 16A\\_5519\\_SBOA.pdf](#)

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On behalf of the Pennsylvania Institute of Certified Public Accountants (PICPA), please see the attached comment letter concerning the State Board of Accountancy's Annex for Regulation 16A-5519.

Thank you for the opportunity to review the draft document. We look forward to working with you as the regulation begins moving through the regulatory review process.

Peter

**Peter N. Calcara, CAE** | Vice President - Government Relations  
Pennsylvania Institute of CPAs | 500 North 3rd Street, Suite 600A | Harrisburg, PA 17101  
717.232.1821 Office | 717.329.5230 Mobile | [www.picpa.org](http://www.picpa.org)



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The opinions expressed herein are my own, and do not reflect those of the Pennsylvania Institute of Certified Public Accountants, or the Institute/Foundation's officers, members or employees.







June 30, 2023

**Via Electronic Mail:** RA-STRegulatoryCounsel@pa.gov

Ronald K. Rouse, Counsel  
State Board of Accountancy  
Penn Center Harrisburg LP  
2601 N 3rd St, Harrisburg, PA 17110

RE: Comments on State Board of Accountancy's Annex for Regulation 16A-5519

Dear Mr. Rouse:

On behalf of the Pennsylvania Institute of Certified Public Accountants (PICPA), thank you for the opportunity to review and provide comments on the State Board of Accountancy's (Board) Annex for Regulation 16A-5519. The PICPA, founded in 1897, is the second oldest and fourth largest CPA organization in the United States, representing nearly 20,000 members in public accounting, business and industry, government, and education.

In general, we are in favor of the proposed revisions in the draft document, although we do have a few reservations. Specifically, we enthusiastically endorse the extension of the examination completion period from 18 months to 30 months. This modification is significant for the accounting community and implementation should be expedited. Our specific areas of concern are highlighted below. The PICPA looks forward to working with the Board and other stakeholders as this proposal moves through the regulatory review process.

Section 11.57: Education requirements for CPA certification

We have strong reservations regarding the inclusion of the new provision (b) in the draft for several reasons, not the least of which is its lack of statutory foundation. More importantly, given the rapidly evolving nature of the accounting profession and its reliance on technology, there is a possibility that these courses may become outdated quickly, necessitating frequent revisions by the Board. For instance, artificial intelligence (AI), which is not mentioned in the draft, clearly falls within the scope of relevant courses. We are concerned about the potential penalties for students who choose to take AI or related courses. Furthermore, what safeguards are in place for students who pursue technology courses in other areas that they and their employers consider suitable for their work? A rigid and prescriptive list would hinder the inclusion of emerging fields like AI (and potentially others in the future). The National Association of State Boards of Accountancy (NASBA) model regulations simply call for information systems and technology for education requirements. A prescriptive list not only puts future Pennsylvania CPAs at a disadvantage compared to licensees in other states (a

competitiveness issue concerning workforce development), but it also appears to be an unnecessary and time-consuming burden to frequently amend the regulations whenever new, more relevant courses arise. It is worth noting that the General Assembly, during its discussions on Act 110 of 2022 (House Bill 1328), which the PICPA guided through the legislative process, did not deem it necessary to specify courses. Therefore, we kindly request the removal of this provision from the final draft.

Section 11.82: Peer review compliance

(2) *Exemption under section 8.9(g)(2) of the act.* A notarized statement from the firm that the following conditions have been met: (i) The firm has not accepted or performed any [audit or review engagement] attestation engagements other than a compilation during the preceding two years.

Sending a notarized statement appears excessive. We recommend that the notification be included in the license renewal process. Specifically, we suggest that firms submit an exemption request on the renewal form, with an understanding that they need to enroll and undergo peer review should they perform an attest engagement other than compilation.

(3) *Exemption under section 8.9(g)(3) of the act.* [One or more of the following:] The firm shall provide to the board a copy of a grant of an extension, including the resulting new due date, within thirty days of receipt from the peer review administering organization.

This is incredibly burdensome for both the firms and the Board's administrative staff. Information on extensions is available to the Board through the peer-review-facilitated state board access website. We recommend adding an additional sentence at the end: "The firm may satisfy this requirement by allowing the grant of extension be included through a secure website provided by the entity administering the peer review." This would significantly reduce the administrative burden of managing extension requests.

Thank you, again, for the opportunity to provide comments on the draft regulations. Please do not hesitate to contact me or Peter Calcara, PICPA vice president—government relations, at [pcalcara@picpa.org](mailto:pcalcara@picpa.org), if you would like to discuss our comments in more detail.

Sincerely,



Jennifer Cryder, CPA, MBA  
Chief Executive Officer

cc: Miranda Murphy, Board Administrator, State Board of Accountancy  
Ashley P. Murphy, Esquire, Prosecution Division

**From:** [Mia Dawn](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR  
**Date:** Monday, July 3, 2023 1:51:16 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. Where western medicine and doctors continued to fail me, my ND was able to help. My body is healing from the inside out and the root issues to my physical symptoms are healing. I have more energy, get sick far less often, and have better emotional health thanks to her help.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’” By negative implication, only registered naturopathic doctors may use the abbreviation ‘N.D.’ This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation ‘N.D.’ This punitive measure makes it appear that

my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of ‘NATUROPATHIC MEDICINE’, ‘NATUROPATHIC SERVICE’, and ‘NATUROPATHIC THERAPIES’ are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use “naturopath”, “traditional naturopath”, or “any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board.” This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves ‘doctor of naturopathy’ and use the post-nominal ‘N.D.’, but the Board fails to define “similar title” or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Mia Means

## Worthington, Amber

---

**From:** Jeff Dittmer <jdittmer6@yahoo.com>  
**Sent:** Friday, June 30, 2023 4:12 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR.

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

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The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’” By negative implication, only registered naturopathic doctors may use the abbreviation ‘N.D.’ This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation ‘N.D.’ This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of ‘NATUROPATHIC MEDICINE’, ‘NATUROPATHIC SERVICE’, and ‘NATUROPATHIC THERAPIES’ are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use “naturopath”, “traditional naturopath”, or “any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board.” This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves ‘doctor of naturopathy’ and use the post-nominal ‘N.D.’, but the Board fails to define “similar title” or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely, Jeffrey Dittmer

## Worthington, Amber

---

**From:** Amie Douglas <asdspurs@msn.com>  
**Sent:** Friday, June 30, 2023 7:27 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR

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Dear Ms. Walter, Esquire:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has provided care that took me from a severe loss of function back to being a happy, healthy wife, mom and office manager after a couple of years of having sought help from MANY Doctors of Medicine with no results. I was told my symptoms were my new normal, and I should just work to function as best I could within my new limitations. I currently have gained back so many areas of my life, as have several of my friends!

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctors of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997 allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am going to receive the care I am looking for, and would also add confusion to the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors, thus, affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The General Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.
2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.
3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.
4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,  
Amie Douglas-Beard



**From:** [Marty Edwards](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Cc:** [Marty Edwards](#)  
**Subject:** [External] nts on 16A-4953-Naturopathic Doctors ANFR  
**Date:** Tuesday, July 4, 2023 8:00:58 AM  
**Attachments:** [PATNA23StateBoardComments.pdf](#)

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I agree with all comments made on the attachment written by William Sloane, PaTNA- president.

Thank you for your time in this matter.  
Marty Edwards, ND, BCNP

WILLIAM MARTIN SLOANE  
ATTORNEY & COUNSELLOR AT LAW  
417 WEST SOUTH STREET  
CARLISLE PA 17013-2829, USA

DBA EdD JD LLM-Labor PhD DCL  
Maryland and Pennsylvania Bars

(+1) 717 249 1069  
sloane@lawyer.com

3 July 2023

Shana M. Walter, Esquire  
State Board of Medicine  
[RA-STRegulatoryCounsel@pa.gov](mailto:RA-STRegulatoryCounsel@pa.gov)

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

To the State Board of Medicine (hereinafter “Board”):

We understand the principle that, because the Independent Regulatory Review Commission (IRRC) has already reviewed the regulations, comments to the Advanced Notice of Final Rulemaking should be limited to the definitions and changes requested by IRRC. As indicated below, however, several other issues must be addressed.

INTRODUCTION. Act 128 of 2016, P.L. 997, allowed registration of certain practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". Our organization, incorporated in 2013, represents traditional naturopaths, who are not required to register.

❶ § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” *The General Assembly has never imposed this requirement on anyone*; if they had, then the clerks in GNC stores (and every mother) would be liable to prosecution.

❷ § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’” By negative implication, only registered naturopathic doctors may use the abbreviation ‘N.D.’ *The General Assembly specifically refrained from enacting title protection for the abbreviation ‘N.D.’* The Board would prohibit traditional naturopaths from stating that they earned an N.D. degree.

❸ In § 18.902, the definitions of ‘NATUROPATHIC MEDICINE’, ‘NATUROPATHIC SERVICE’, and ‘NATUROPATHIC THERAPIES’ are so extremely broad as to encompass every function performed for decades by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. This entire section is ultra vires: *The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the Board to do so.*

❹ § 18.907 allows non-registered practitioners to use “naturopath”, “traditional naturopath”, or “any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board.” Implies to whom? *The General Assembly does not prohibit traditional naturopaths from calling themselves ‘doctor of naturopathy’ or using the post-nominal ‘N.D.’*, but the Board fails to define “similar title” or to spell out what titles imply board registration. This violates Fourteenth Amendment Due Process by forcing traditional naturopaths to guess, at their own peril, what the Board thinks that ‘N.D.’ implies. A simpler solution would be to prohibit non-registered practitioners from falsely stating that they are registered, just as non-licensed professional counselors are prohibited from falsely stating that they are licensed professional counselors.

PENNSYLVANIA TRADITIONAL NATUROPATHS ASSOCIATION (PATNA)  
BY: *William Martin Sloane*, President

**From:** [Elaine Edye](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Naturopath  
**Date:** Wednesday, July 5, 2023 7:37:42 AM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Robert Edye Jr

Here is info on what a traditional naturopath is if you want to read and use in your letter or just become familiar with the term. [Naturopathic Doctor - PA Traditional Naturopath Association \(panaturopaths.com\)](http://panaturopaths.com)



[PA Traditional Naturopath Association](http://panaturopaths.com)

Doctors of Traditional Naturopathy have been around since the 1800s, a system of the Healing Arts and Drugless Healthcare .

[panaturopaths.com](http://panaturopaths.com)

Betty Magill, ND  
C-Life, Inc.  
*Living Healthy, Healthy Clean*  
C-Life, Inc.  
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[www.C-LifeInc.com](http://www.C-LifeInc.com)

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**From:** [Rosemary Fielding](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."  
**Date:** Wednesday, July 5, 2023 8:30:02 AM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. I have been under her care for almost six years. She has cleared up four health problems that other M.D.s had not been able to do.

Now I understand that new regulations could threaten my naturopathic doctor's tremendous work with patients. More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically-oriented Doctor of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997 allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine." These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

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Thank You for Your Consideration.

Sincerely,

Rosemary Fielding

## Worthington, Amber

---

**From:** Danielle Foss <billanddaniellefoss@gmail.com>  
**Sent:** Friday, June 30, 2023 2:33 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

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This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

### **The State Board of Medicine has proposed regulations that would impair my healthcare.**

With all of this said...Not only will taking her ND title away be detrimental, GIVING this title to someone who IS NOT a true ND is also MISLEADING and NEGLIGENT, in my opinion. For someone who seeks 100% non-pharmaceutical health care, for this title for so long to be used in the natural health field and then switched is careless!

Thank you for taking MY feelings, MY health, MY well-being and my families into consideration.

Danielle Foss

(610) 780-6439

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

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3. In § 18.902, the definitions of ‘NATUROPATHIC MEDICINE’, ‘NATUROPATHIC SERVICE’, and ‘NATUROPATHIC THERAPIES’ are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use “naturopath”, “traditional naturopath”, or “any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board.” This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves ‘doctor of naturopathy’ and use the post-nominal ‘N.D.’, but the Board fails to define “similar title” or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Danielle N. Foss, LMT

**Zoë103**

*1 Peter 1:03 - His divine power has given us everything we need for life (zoë) and godliness through our knowledge of him who called us by His own glory and goodness.*





**From:** [Sharon Gazdich](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] comments on 16A-4953 - Naturopathic Doctors ANFR  
**Date:** Sunday, July 2, 2023 6:19:22 PM

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Dear Ms. Walter,

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me and multiple family members to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.) Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles “naturopathic doctor” and “doctor of naturopathic medicine”. These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title N.D. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a (e) requires a license before “recommending herbs, minerals, and other supplements, or combinations according to traditions other than Oriental medicine traditions.” The General Assembly has never imposed this requirement on anyone ; if they had, then the clerks in every GNC store (not to mention millions of others) would be liable to prosecution by the State.
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that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE,' 'NATUROPATHIC SERVICE,' and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.
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My family and I have benefited in so many ways using our N.D.

Thank you for your consideration,

Sharon Gazdich

Sent from [Mail](#) for Windows

**From:** [Vanessa Gooch](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR.”  
**Date:** Wednesday, July 5, 2023 11:37:42 AM

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Dear Ms. Walter:

I realize that I am a tad late sending this, but feel that it is so important and after observing our first big Independence Day celebration, I am compelled that much more to write to you. I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped my family immensely these past few months. After dealing with issues with my kids for years and having severe adverse reactions to some prescription medications, she has helped us start a healing journey to good health without prescription drugs.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

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Thank You for Your Consideration.

Sincerely,

Vanessa Gooch

361-453-5921

## Worthington, Amber

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**From:** Ginny Homonai <ginnypeach@gmail.com>  
**Sent:** Saturday, July 1, 2023 1:50 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."

**ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

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3. In § 18.902, the definitions of ‘NATUROPATHIC MEDICINE’, ‘NATUROPATHIC SERVICE’, and ‘NATUROPATHIC THERAPIES’ are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

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Thank You for Your Consideration.

Sincerely,  
Ginny Homonai

**From:** [Brian Hood](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR  
**Date:** Friday, June 30, 2023 5:04:40 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to have improved health and energy. I am a person with physical disabilities (wheelchair-bound) who is unable to take many traditional medications, because I have had extreme negative reactions to them. I am thankful that I can currently work with both my M.D. and my N.D. to help me to make the best possible health choices for myself. I am concerned about some regulations the State Board of Medicine is proposing which may impair my ability to do so and may cause my N.D. and other naturopaths to stop helping people. Perhaps the following will help you to better understand my concerns.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine." These are not the kind of naturopaths I wish to consult. If I have an illness or injury that needs diagnosis and treatment, I will seek treatment from a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors, affecting the health care of many PA residents.

The State Board of Medicine has proposed the following regulations that would impair my healthcare:

1. § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” The General Assembly has never imposed this requirement on anyone. If they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.
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Thank you for considering my concerns about this. I hope you have a very blessed weekend and Independence Day celebration!

Sincerely,

Penny Hood



**From:** [Kezia Jackman](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR  
**Date:** Monday, July 3, 2023 12:42:29 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years., I reached out to her after hearing several success stories from personal acquaintances. I had a very concerning and debilitating health concern that I did not want to take to the traditional medical system. In six weeks, the remedies she prescribed had a dramatic healing affect on my health condition, which had steadily worsened over the previous 6 weeks. My experience with traditional medical doctors is that they tend to treat the symptoms, sometimes leaving me with new and worse symptoms, while not getting to the root of the issue. My N.D. searches for the root of the medical condition and treats the source, and as a result, is highly successful in her treatment plan.

I cannot emphasize enough how much I want my ND to be able to continue in her profession. She is affordable, highly successful in her treatments, and someone whose expertise I would not want to be without in the upcoming years as I prioritize my health.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

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Thank You for Your Consideration.

Sincerely,

Kezia Jackman

**From:** [Susan Jennings](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR  
**Date:** Friday, June 30, 2023 11:14:22 PM

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Shana M. Walter, Esquire, State Board of Medicine

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

Dear Ms. Walter,

I am writing to you today to express my thoughts on new regulations that the State Board of Medicine is considering which would strip the initials away from traditional naturopathic doctors who currently have the ability to use the title of Doctor of Naturopathy and the initials N.D. I am asking you to protect traditional practitioners and allow them to continue using this title and initials.

My family sees a Doctor of Naturopathy (N.D.) whose office is in Fayette County. We have worked with her for the past 12 of the 15 years she has been in practice and she has helped us to remain in good health, without the use of prescription medications or surgeries. We have seen many improvements and function much better because of this natural health care.

My family has reactions to "safe" pharmaceutical medications and we rely heavily on innocuous and highly effective supplements and homeopathic medicines. We use both to support our immune systems and much more. We use supplements safely and have never had a problem with them for many years now. I can't say the same about pharmaceutical drugs as we have had numerous adverse biological effects when using them.

In 2016, a new profession was created with Act 128 of 2016, P.L. 997: allopathically oriented Doctors of Naturopathic Medicine (N.M.D.). Act 128 allowed the registration of these new practitioners and gave them protection for the titles of "naturopathic doctor" and "doctor of naturopathic medicine." We do not desire to see this type of naturopath. We will consult with a qualified Doctor of Medicine (M.D.) should we become injured or become ill and need diagnosis and treatment.

My naturopath is a traditional practitioner and is not required to register with the State. It is important to note, and should be made clear, that a traditional naturopath can use the title ND. Our ND studied and earned the ND certification and the new

regulations the Board is considering would take those initials away from her. This title gives my family the assurance that we are getting the care we look for and we prefer. If this title was not there, it would confuse us and the public. People find this type of help by the title and without it, people will not know where to find it.

Sadly, taking the action of stripping the title and initials from the traditional naturopaths could negatively affect their flow of income, which could force them to close their offices. This would adversely affect my family and many other Pennsylvania residents.

**The State Board of Medicine has proposed the following regulations that would impair my healthcare:**

- 1. § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.”** The General Assembly has *never* imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.
- 2. § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’”** By negative implication, only registered naturopathic doctors may use the abbreviation ‘N.D.’ This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation ‘N.D.’ This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.
- 3. In § 18.902, the definitions of ‘NATUROPATHIC MEDICINE’, ‘NATUROPATHIC SERVICE’, and ‘NATUROPATHIC THERAPIES’ are so extremely broad as to encompass every function performed by traditional naturopaths.** By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.
- 4. § 18.907 allows non-registered practitioners to use “naturopath”, “traditional naturopath”, or “any similar title implying that the individual practices naturopathy so long as the title does**

**not also imply that the individual is a naturopathic doctor registered with the Board.”** This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves ‘doctor of naturopathy’ and use the post-nominal ‘N.D.’, but the Board fails to define “similar title” or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

I appreciate your attention to this issue and I ask the State Board of Medicine to protect traditional naturopaths by allowing them to continue to use the title of Naturopathic Doctor and the initials N.D. Many people will be affected by stripping these designations from the traditional naturopaths, my family being one of them.

Thank you for your consideration and for protecting many Pennsylvanians!

Respectfully Submitted,

Susan Jennings

Mount Pleasant, PA  
724-613-4262

**From:** [Veda Kaufman](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR  
**Date:** Monday, July 3, 2023 6:12:43 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

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2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Veda Kaufman

**Worthington, Amber**

---

**From:** Julie Lachman <jl@drlachman.com>  
**Sent:** Sunday, July 2, 2023 8:00 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] comments on 16A-4953—Naturopathic Doctors ANFR  
**Attachments:** NDRA note of advanced rulemaking response JL 0723.pdf

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To whom it may concern, please find attached comments on 16A-4953—Naturopathic Doctors ANFR.

Thank you,

**Julie Lachman, ND LLC**

Lachman and Associates--We won **Best of Bucks in Family Medicine** (again!) in 2023! Thank you! Volunteer, Foundation for Wellness Professionals providing wellness talks and screenings to the local community.

Naturopathic physician licensed in Vermont



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P:  [\(267\) 406-0782](tel:(267)406-0782)(888) 972-5592 (Fax)  
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[www.shop.drlachman.com](http://www.shop.drlachman.com)



1432 Easton Rd. Suite 3G

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July 3, 2023

Shana M. Walter

Board Counsel

Pennsylvania State Board of Medicine

P.O. Box 69523

Harrisburg, PA 17106-5923

[RA-STRegulatoryCounsel@pa.gov](mailto:RA-STRegulatoryCounsel@pa.gov)

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

Dear Board Counsel,

Please allow me to make one further comment on Section 18.908, Informed consent and disclosure of financial interests.

I was trying to find any basis for this section in any other regulation, including the voluminous 1985 medical practice act. The only marketing/compensation regulation I could find was the anti-kickback statute, which only applies to Medical Assistance participants.

It is important to note that this bill is a registration bill, and not a practice act, however, and informed consent and disclosure of financial interests may be more adapted to a practice act. Naturopathic doctors are requesting parity with other regulated medical providers and I suggest removal of this section.

Regarding Section 18.907(c), Acceptable titles and professional designations, I was unable to find any other registered or licensed professional in Pennsylvania who cannot use their given degree or title even if not registered or licensed at that time. I think only in the military do we use the term retired (ret), listed after the person's highest earned rank. Again, members of the Pennsylvania Association of Naturopathic Physicians are requesting parity with other regulated professionals in the commonwealth. Having different designations for people with the same degree based on if they are registered or not opens a precedent for confusion with future professional regulations. The PANP will encourage anyone who is practicing Naturopathic medicine to be registered with the state. Persons choosing not to would have to distinguish themselves as not practicing, but consulting or advising, just like foreign medical providers in

this commonwealth can use their medical title and knowledge but don't 'practice'. A situation of a qualified Naturopathic doctor not registering with the state seems unlikely. Like doctors of Chiropractic, Osteopathy and Medicine, our degree is the same as our postnominal. Acupuncturists may, on the other hand, have an MS degree, but the LAc designation, which are clearly two separate things. Here is where the Registered designation may be useful.

Thank you for your time and continued attention.  
Respectfully submitted,

Julie Lachman, ND



**Worthington, Amber**

---

**From:** Julie Lachman <jl@drlachman.com>  
**Sent:** Monday, July 3, 2023 11:27 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953– Naturopathic Doctors ANFR  
**Attachments:** NDRA note of advanced rulemaking response JL 0723 addendum.docx

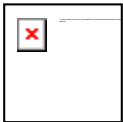
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To whom it may concern:  
Please accept this submission regarding the above regulation.

**Julie Lachman, ND LLC**

Lachman and Associates--We won **Best of Bucks in Family Medicine** (again!) in 2023! Thank you! Volunteer, Foundation for Wellness Professionals providing wellness talks and screenings to the local community.

Naturopathic physician licensed in Vermont



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July 2, 2023

Shana M. Walter

Board Counsel

Pennsylvania State Board of Medicine

P.O. Box 69523

Harrisburg, PA 17106-5923

[RA-STRegulatoryCounsel@pa.gov](mailto:RA-STRegulatoryCounsel@pa.gov)

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

Dear Board Counsel,

Thank you for the time and meticulous attention you all have put into promulgating the above regulation.

I am a Bucks County native and have practiced in Pennsylvania for 11 years, earning Best in Family Medicine multiple times. I would like to comment on the above act as well as the letter submitted to the board by Senator Mastriano, which is mentioned in your recent proposed rulemaking letter.

First, the Senator’s letter itself is a testament to the difficulty of those not involved with the issue to understand the difference between Naturopathic doctors affected by the NDRA, and all those not regulated by it. He states: “According to the Board’s proposed regulation below, if unamended, would be detrimental financially and professionally to the thousands of established naturopathic doctors and traditional naturopathic doctors...” You can see here that he is using ‘Naturopathic doctors’ and ‘traditional naturopathic doctors’ interchangeably. Secondly, according to the website for the Pennsylvania Traditional Naturopaths Association (<https://panaturopaths.com/find-a-nd-practitioner>), there are fifteen traditional naturopaths with Pennsylvania addresses (as well as two students, and one person with no address listed).

A few years ago I had a patient come to see me who had recently had a miscarriage. She had scheduled with a traditional naturopath, but happened to be able to get in to my office sooner due to her schedule. She was under the impression that the other person and I were the same type of

provider, and I think she was looking for someone with a 4-year post-graduate residential education, the kind of provider we think about with the word ‘doctor’.

Next, the “vigorous course of study, [and] continuing education” that Senator Mastriano references that he attributes to the traditional naturopaths is not accredited by any accrediting body so there is no third-party validation of his statement.

Further, the Senator states: “It is unconscionable to restrict current naturopathic doctors of their titles and use of the term ‘Doctor of Naturopathy’ which is their livelihood in such a manner and without cause on their part.” In many states, one cannot call oneself a ‘doctor’ without attending a course that is approved by a regional educational accrediting body. You’re probably aware that in 2004 one of our Pennsylvania attorneys general got an online degree from a school in Texas, in the name of his cat. The ‘Doctor of Naturopathy’ ‘degree’ was not actually an actual degree.

Lastly, Senator Mastriano suggests that any persons not regulated by this act can use the title Doctor of Naturopathy. That language was not in the act, and serves to confuse the public. If one of the main intents of the act was to differentiate persons regulated by the state under this act from those who are not regulated, I see no other way to do this than to put R in front of ND, if the board does not want to protect the title ND. As Dr Heidi Weinhold wrote in her June 27, 2023 letter to you, ND is the universal title for Naturopathic Doctor. In this instance, the term Osteopath means Doctor of Osteopathy, and likewise for those regulated by this act. Naturopathic doctors are asking for parity with other regulated providers.

Although the act does not specify postnominals to be used by those regulated by the act, it also doesn’t restrict the Board from designating them when appropriate. Having the R in front of ND also helps those NDs who are retired, consulting, teaching, speaking, or using their education in non-clinical manners to continue using the term Naturopathic Doctor, without making it seem like they are registered by the board. If they can’t use that term, how can they be distinguished as having earned the degree? This means that someone coming in to lecture for a conference would have to remove Naturopathic Doctor from all his/her presentations. We could add (ret.) after Naturopathic Doctor if someone is indeed retired, but that excludes others who have different non-clinical roles and don’t need registration.

Section 18.905, Inactive status: I suggest you add the text ‘clinical examination’ after NPLEX, as there is also a basic science examination.

Section 18.908, Informed consent and disclosure of financial interests. Would registered Naturopathic doctors be included in the ‘service from a health care practitioner’? I find this section difficult to prove or enforce. If I do an educational lecture, would I need a signature from every participant acknowledging that some of the content of the education may be performed in my office and may generate revenue? If someone is a prospective patient, as the act states, how would I get a consent form stating that they understand that I may receive a commission on a product I may sell, if they’re calling in over the phone? Would this apply to any funds we generate or just those funds created through marketing? How do I know if someone found me through marketing activity or through word of mouth? Should I put this on my ads? Everyone knows that ads are printed to generate revenue. Though my understanding is that this section

does not apply to regular business activity, but only to commissions, referrals, ect, it is so confusing that it bears removal. The regulation as it already stands includes the following provision in Chapter 2, section 201: “(2) Making misleading, deceptive, untrue or fraudulent representations in the practice of naturopathic medicine or practicing fraud or deceit...” (The statement continues: “..either alone or as a conspirator, in obtaining a registration or in obtaining admission to a medical college.” Now it makes it hard to understand if the fraud or deceit was in the practice of naturopathic medicine, or in the obtaining of a registration or admission to a medical college.)

The IRRC comments included request for a definition of ‘traditional naturopath’. We can define this person as ‘any person not regulated by the act’. Going any further is out of the scope of this act.

Thank you for your time and continued attention.  
Respectfully submitted,

Julie Lachman, ND



**From:** [Keith Ledford](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] "Comments on 16A-4953 - Naturopathic Doctors ANFR Shana M. Walter, Esquire State Board of Medicine"  
**Date:** Friday, June 30, 2023 2:21:29 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The General Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and

'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Linda L. Ledford



**From:** [suzigt1](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR.  
**Date:** Friday, June 30, 2023 2:39:30 PM

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Ms. Walter,

I have been a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. This N.D. has afforded our family an exceptional level of health without the use of meds.

She has helped where allopathically oriented doctors have been unable. I am referring to quality of life issues rather than life threatening issues.

Allopathically Naturopathic Medicine, generally N.M.D., Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have a life threatening illness or injury, I would, like you, without hesitation, go see a qualified M.D.

Currently, traditional practitioners like mine, are not required to register with the state. A traditional naturopath can and should use the title ND. This title assures clients like myself are receiving the care they are looking for. Any other title would be confusing.

While it would be difficult for me, the individual, to maintain optimal health, it would effect a large group of people as a whole. For instance, the income stream of her office would be lost as no doubt it would cost her job and that of her employees. This is not a desirous outcome. We need good paying jobs like these in PA.

The State Board of Medicine has proposed regulations that would impair my healthcare and cost jobs. Surely what is important at its core is the care of individuals.

Here are some other much larger groups of people to consider as well:

1. § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” The Generally Assembly has not previously imposed this requirement on individuals, for clerks in, but not limited to, GNC stores or Vitamin Shoppe would be liable to prosecution by the State.

2. § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’” By negative implication, only registered naturopathic doctors may use the abbreviation ‘N.D.’ This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from

enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the board fails to define "similar title" or to spell out what titles imply board registration. This violates due process by forcing naturopaths to act at their own peril.

Thank you,

S. Lee

## Worthington, Amber

---

**From:** Alanna McIntire <alanna@mcintireministries.com>  
**Sent:** Monday, July 3, 2023 11:00 AM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR

**ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

Dear Ms. Shana M. Walter, Esquire / State Board of Medicine:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. Having studied with individuals leading in her field of expertise, being highly trained, and being experienced from having practiced for 15 years, my N.D. has helped me to obtain much better health without prescription drugs or surgery. Her knowledge of balanced whole body health includes natural alternatives for better overall health, as well as, suggestions for lifestyle and dietary changes, educating others about how to live a more healthy life, and preventive measures to avoid potentially serious medical conditions. Her advice has proven to be very beneficial in my life helping me to function much better and enabling me to be able to take care of my children and allowing me to assist my husband with some of his responsibilities. These were things I was struggling to perform well due to physical conditions I have faced. My N.D. has also been a great help to several of my friends and family who through her advice and expertise have been able to improve physically and discover crucial lifestyle changes they needed to make to live a more productive life.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine".) These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis or medical intervention, I will not hesitate to see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title N.D. This title gives me the assurance I am getting the type of care I am looking for from a qualified individual. It would confuse the public if this title were removed. Without this title of N.D. many who seek this type of help would not be able to locate a trained traditional naturopath.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many who for various reasons could struggle physically without the aid of the naturopaths' skills and hinder them from being as productive in society.

The State Board of Medicine has proposed regulations that would impair my personal healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

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4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Please allow traditional naturopaths to maintain the ability to use the title of N.D. so they may continue to be a blessing to citizens.

Thank you for your consideration.

Sincerely,

Alanna G. McIntire

**From:** [Mia Dawn](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR  
**Date:** Monday, July 3, 2023 1:51:16 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. Where western medicine and doctors continued to fail me, my ND was able to help. My body is healing from the inside out and the root issues to my physical symptoms are healing. I have more energy, get sick far less often, and have better emotional health thanks to her help.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’” By negative implication, only registered naturopathic doctors may use the abbreviation ‘N.D.’ This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation ‘N.D.’ This punitive measure makes it appear that

my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of ‘NATUROPATHIC MEDICINE’, ‘NATUROPATHIC SERVICE’, and ‘NATUROPATHIC THERAPIES’ are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use “naturopath”, “traditional naturopath”, or “any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board.” This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves ‘doctor of naturopathy’ and use the post-nominal ‘N.D.’, but the Board fails to define “similar title” or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Mia Means

**From:** [Roger Mitchell](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR  
**Date:** Friday, June 30, 2023 8:29:29 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy Betty Magill in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

I have been a client of Dr. Magill for 10 years. When I first went to see Dr. Magill I was very sick. After seeing a number of Medical Doctors, I was told that I needed surgery that would reduce acid reflux. That surgery had a high probability of complications and a fairly low success rate for eliminating acid reflux. Because I was on a number of proton pump inhibitors, I developed another problem that was not diagnosed by my gastroenterologist and at that time, wasn't even recognized by the AMA. Dr. Magill identified the problem. As a result, many thousands of dollars were saved by my insurance and me.

I have seen many clients of Dr. Magill who have overcome a number of health issues, myself included.

Let me add, I worked in the health field for over thirty years and can honestly say I never saw a Doctor get the positive results that Dr. Magill has experienced with her clients.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection

for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

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locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

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I have honorably served my Country for nearly thirteen years, worked in public service for over thirty years, have been a volunteer fireman for many years, volunteered for a number of local organizations, and currently hold a local government office. This proposed addition to current regulations concerns me and I am sure many of my constituents.

Thank You for Your Consideration.

Sincerely,  
Roger D. Mitchell

**From:** [Milena Muskin](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."  
**Date:** Friday, June 30, 2023 5:03:32 PM

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Email SUBJECT: "Comments on 16A-4953 – Naturopathic Doctors ANFR."

Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. **Prior to seeing her I was close to killing myself. My PCP and dozens of specialists could not figure out how to help me. I had nervous system/brain damage from long term mold exposure. She has helped me see real results and healing.**

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Thank You for Your Consideration.

Sincerely,

**From:** [Milena Muskin](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."  
**Date:** Saturday, July 1, 2023 8:28:30 AM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. **Prior to seeing her I was close to killing myself. My PCP and dozens of specialists could not figure out how to help me. I had nervous system/brain damage from long term mold exposure. She has helped me see real results and healing.**

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Thank You for Your Consideration.

Sincerely,

Milena Muskin

## Worthington, Amber

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**From:** Joyce Nissley <joyce.nissley@gmail.com>  
**Sent:** Sunday, July 2, 2023 7:24 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments in 16A-4953-Naturopathic Doctors ANFR

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7-2-23

Shana M. Walter, Esquire

Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

I have been dealing with chronic lymes disease and been evaluated by my PCP, Rheumatologist, Otolaryngologist, Neurologist and Balance Clinic department. In being treated by my N.D., my symptoms have definitely improved I thought I was going crazy with the dizziness, left side weakness, muscle and joint pains.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

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credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Joyce M. Nissley

Sent from my iPhone

## Worthington, Amber

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**From:** C Petito <cpetito32@yahoo.com>  
**Sent:** Tuesday, July 4, 2023 10:02 AM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] N.D. saved my life

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The State Board of Medicine has proposed regulations that would impair my healthcare to a grave degree.

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Thank You for Your Consideration.

Sincerely,

Christina Petito, BS, MA, Advanced CASAC

**From:** [Michele Petix](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External]  
**Date:** Sunday, July 2, 2023 8:56:52 PM

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Dear Ms. Walter,

I have been a client of a naturopathic doctor in my area for almost 9 years. The care I have received has been tremendous in helping me to stay healthy.

I have a 95 year old mother who really depends on me for everything and it is so important that I remain healthy. I know that I would not be enjoying wonderful health at this point if it wasn't for the tremendous help I've received from my Naturopath.

I appreciate your attention in this matter.

Thank you so much.

Sincerely,  
Michele Petix

## Worthington, Amber

---

**From:** Christi Pletcher <christipletcher@gmail.com>  
**Sent:** Monday, July 3, 2023 10:23 AM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR

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Dear Ms. Walter:

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Thank You for Your Consideration.

Sincerely,

Christi Pletcher

**From:** [Nikki Singer](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."  
**Date:** Sunday, July 2, 2023 11:36:33 PM

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Dear Ms. Walter:

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Thank You for Your Consideration.

Sincerely,

Nikki Potter

**From:** [michaelreecend@frontiernet.net](mailto:michaelreecend@frontiernet.net)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953 Naturopathic Doctors ANFR  
**Date:** Friday, June 30, 2023 9:32:25 PM

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June 30, 2023

Shana M Walter  
Board Counsel  
Pennsylvania State Board of Medicine  
PO Box 69523  
Harrisburg, PA 17106-5923

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

Dear Board Counsel,

My name is Michael Reece, ND. I am a 1983 graduate of what is now known as Bastyr University in Kenmore, Washington, where I completed a four year residential program in naturopathic medicine. I have been in Pennsylvania forty years, and I served as President of the Pennsylvania Association of Naturopathic Physicians for many years leading the effort to promote legislation to license Naturopathic Doctors in Pennsylvania. I support the registration of Naturopathic Doctors in Pennsylvania, and I welcome the opportunity to comment on 16A-4953.

Section 18.907b

The proposal put forth by Senator Mastriano and others who desire to allow anyone to use the term "ND" causes confusion among the public since it does not differentiate between naturopathic doctors (who have completed a four-year residential naturopathic medical program, including over 4100 hours of classroom time plus several hundred hours of clinical training) and those calling themselves Traditional Naturopaths (who have varied non-standardized educational backgrounds). Even conventional medical practice has developed and standardized over the years with modern practice looking very different from medical practice 50+ years ago (along with the determination of who is qualified to engage in current medical practice).

The oldest accredited naturopathic medical university in North America was established in 1956 with the inclusion of medical science courses alongside natural therapeutics. Course content has been updated to reflect advances in medical science, and holders of naturopathic medical licenses are required to take continuing education courses to maintain their licenses. This underscores the need for a distinction between NDs who have attended naturopathic medical schools (with passage of licensing exams and maintaining continuing education credits) and Traditional Naturopaths (who, for

the most part, have not). This becomes a public safety issue, and the NDRA attempts to address issues of accountability and oversight.

It is not our intention to interfere with individuals who wish to use natural remedies. However, naturopathic medical practice, four-year naturopathic schools and naturopathic medical licensure has been around since the early 1900s, and should be distinguished from the traditional naturopath. This impacts public understanding and safety.

#### Section 18.902

The Council on Naturopath Medical Education (CNME) is an accrediting agency recognized by the US Department of Education and accredits both naturopathic medical schools and programs.

#### Section 18.905

Subsection (a) states “A naturopathic doctor may not use the title of “naturopathic doctor,” “doctor of naturopathic medicine” or any other term implying that the individual is currently registered as a naturopathic doctor while on inactive status.” The “ND” degree (which means “naturopathic doctor” or “doctor of naturopathic medicine”) is a degree conferred by the accredited naturopathic medical school the ND attended and graduated from. The state does not grant this degree, and I question if the state could prevent its use by those who have earned the ND degree. In addition, there may be opportunities for naturopathic doctors to participate in non-clinical (consulting) or academic (teaching) settings, and the use of the ND degree reflects the education and expertise of the naturopathic doctor.

#### Section 18.913

Subsection (6) describes Grounds for discipline Promoting the sale of services, drugs, devices, appliances or goods to a patient so as to exploit the patient for financial gain. Many Naturopathic Doctors provide supplements available for purchase for their clients, not only as a convenience to patients, but also to insure the patient is getting the best quality supplement with verifiable ingredient content (not typically found in conventional drug stores or health food stores). While there is no intention to deceive or exploit the patient, the determination of what constitutes exploitation is vague.

Thank you for receiving these comments, and thank you for your efforts to finalize the rules and regulations process for Naturopathic Doctors in Pennsylvania!

Regards,  
Michael Reece, ND  
4233 Oregon Pike  
Ephrata, PA 17522

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## Porta, Jason

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**From:** Rachel Reist <rreist@outlook.com>  
**Sent:** Friday, June 30, 2023 4:52 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.
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credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

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Thank You for Your Consideration.

Sincerely,

Rachel

Sent from my iPhone

**From:** [psreitmom4@gmail.com](mailto:psreitmom4@gmail.com)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] ND Titles  
**Date:** Saturday, July 1, 2023 9:19:51 PM

---

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Dear Ms. Walter:

My husband is a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. She and another N.D. have helped him after a year of seeing medical doctors, and making no progress in finding the problem. His health is now improving without prescription drugs or surgery. I have also been helped by an ND in the past when I was suffering from what turned out to be Lyme Disease.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom we wish to consult; if we have an illness or injury that needs diagnosis and treatment, we will go see a qualified Doctor of Medicine (M.D.).

My husband's naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives us the assurance that he is getting the care he is looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors, affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair our healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

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Thank You for Your Consideration.

Sincerely,

Pamela Reitenbach

Sent from [Mail](#) for Windows

## Porta, Jason

---

**From:** Sharon Ross <srosslanz@gmail.com>  
**Sent:** Saturday, July 1, 2023 8:49 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR

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Thank You for Your Consideration.

Sincerely,  
Sharon Lanz

## Worthington, Amber

---

**From:** rydelinteriors@gmail.com  
**Sent:** Friday, June 30, 2023 6:59 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] "Comments on 16A-4953 - Naturopathic Doctors ANFR."

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. Being healthy as I age is very important to me and I rely on her in my health journey. I am 76 and in the best health thanks to the work my Naturopath does and still live an active life, work and purpose.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

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Thank You for Your Consideration.

Sincerely,

Claudia Rydel

**From:** [Richard Rydel](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."  
**Date:** Monday, July 3, 2023 8:31:49 AM

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Dear Ms. Walter:

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Thank You for Your Consideration.

**Sincerely,**

**Richard Rydel**

Here is info on what a traditional naturopath is if you want to read and use in your letter or just become familiar with the term. [Naturopathic Doctor - PA Traditional Naturopath Association \(panaturopaths.com\)](http://panaturopaths.com)



[PA Traditional Naturopath Association](http://panaturopaths.com)  
Doctors of Traditional Naturopathy have been around since the 1800s, a system of the Healing Arts and Drugless Healthcare .  
[panaturopaths.com](http://panaturopaths.com)

Betty Magill, ND  
C-Life, Inc.  
*Living Healthy, Healthy Clean*  
C-Life, Inc.  
Betty Magill, ND  
265 Shoaf Road  
Smithfield, PA 15478  
724-564-9013  
[www.C-LifeInc.com](http://www.C-LifeInc.com)

**From:** [Kaitlin Scholl](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Comments on 16A-4953-Naturopathic Doctors ANFR  
**Date:** Monday, July 3, 2023 9:57:33 AM  
**Attachments:** [PA Medical Board Letter.docx](#)

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Please see attached document.

Thank you for your consideration,

Kaitlin Scholl

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Kaitlin Scholl  
Children's Pastor  
Selinsgrove Church of the Nazarene  
Cell: (570) 541-5076

July 3, 2023

Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

My husband first began as a client and the impact it has had on his health has led us as a family to consult with her on a more regular basis. There has not been one time that our health has not improved significantly as a result of the care we received. We are only one of many families who have experienced life changing results from natural health care, making us more productive members of society.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

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Thank You for Your Consideration.

Sincerely,

Kaitlin Scholl

## Porta, Jason

---

**From:** mailagent@thesoftedge.com on behalf of Tamara Shade <mailagent@thesoftedge.com>  
**Sent:** Friday, June 30, 2023 10:50 AM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Dear Ms. Walter:

I appreciate the opportunity to comment on 16A-4593. After reading through the proposed rules from the PA Medical Board, I want to share my concerns with proposed language that is inconsistent with the language, spirit and intent of the Naturopathic Doctor Registration Act (NDRA), 63 P. S. §§ 272.101--272.301.

The proposed rules have included reference to "lay practitioners" in §18.907. Respectfully request that any inclusion of "lay practitioners" in rules applying to the NDRA be stricken. The language and intent of the NDRA is to ensure PA citizens who wish to avail themselves of the services of a Naturopathic Doctor, they can be confident a practitioner using the designation Naturopathic Doctor (ND), Registered Naturopathic Doctor (RND), or Doctor of Naturopathic Medicine (DNM), has achieved all of the education requirements defined in the NDRA. I applaud the requirement of passage of the competency examination administered by the North American Board of Naturopathic Examiners (NABNE), known widely as the Naturopathic Physician Licensing Exam (NPLEX).

Additional points of clarification and suggestions include::

§18.905(b), refers to registrants who have not had clinical contact with patients for four (4) years or more shall demonstrate passage of the NPLEX within 12 months of application.

Add clarifying language specific to passage of NPLEX Part II - Core Clinical Science Examination, the relevant assessment for reactivation of registration.

Please update the required hours in § 18.904(b)(5) and § 18.905(b)(6) to be consistent throughout with 23 Pa.C.S. § 6383(b)(3)(i) (relating to education and training).

Thank you again for the opportunity to provide comments and feedback.

Sincerely,

Tamara Shade  
252 Meadowview Rd  
Dillsburg, PA 17011





## Porta, Jason

---

**From:** mailagent@thesoftedge.com on behalf of Tamara Shade <mailagent@thesoftedge.com>  
**Sent:** Friday, June 30, 2023 10:52 AM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Dear Ms. Walter:

Thank you for the opportunity to comment on 16A-4593. I appreciate the work the PA Medical Board has conducted in seeking feedback to ensure the proposed rules reflect the spirit and intent of the Naturopathic Doctor Registration Act (NDRA), 63 P. S. §§ 272.101--272.301. The following comments are provided with the intent to help the PA Board remedy the inconsistencies between the letter and intent of the NDRA and the proposed language in 16A-4593.

I respectfully request removal of any and all references to "lay practitioners" in §18.907. The language and intent of the NDRA is to ensure PA citizens who wish to avail themselves of the services of a Naturopathic Doctor, that they can be confident a practitioner using the designation Naturopathic Doctor, Registered Naturopathic Doctor, or Doctor of Naturopathic Medicine, has achieved the education requirements and passed the required competency examination administered by the North American Board of Naturopathic Examiners (NABNE).

Additional requests include the following:

18.905(b), refers to registrants who have not had clinical contact with patients for four (4) years or more shall demonstrate passage of the NPLEX within 12 months of application.

Add clarifying language specific to passage of NPLEX Part II - Core Clinical Science Examination, the relevant assessment for reactivation of registration.

In § 18.903, (b)(5) the required number of hours are listed as three (3), whereas in subsequent paragraphs § 18.904(b)(5) and § 18.905(b)(6), the required hours are listed as two (2), which are inconsistent references to requirements of 23 Pa.C.S. § 6383(b)(3)(i) (relating to education and training).

Thank you again for the opportunity to provide comments and feedback.

Sincerely,

Tamara Shade  
1524 Cedar Cliff Dr  
Camp Hill, PA 17011-7713



## Worthington, Amber

---

**From:** mailagent@thesoftedge.com on behalf of drjess@naturalpathstowellness.com  
**Sent:** Thursday, June 29, 2023 6:04 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Dear Ms. Walter:

I appreciate the opportunity to comment on 16A-4593. After reading through the proposed rules from the PA Medical Board, I want to share my concerns with proposed language that is inconsistent with the language, spirit and intent of the Naturopathic Doctor Registration Act (NDRA), 63 P. S. §§ 272.101--272.301.

The proposed rules have included reference to "lay practitioners" in §18.907. Respectfully request that any inclusion of "lay practitioners" in rules applying to the NDRA be stricken. The language and intent of the NDRA is to ensure PA citizens who wish to avail themselves of the services of a Naturopathic Doctor, they can be confident a practitioner using the designation Naturopathic Doctor (ND), Registered Naturopathic Doctor (RND), or Doctor of Naturopathic Medicine (DNM), has achieved all of the education requirements defined in the NDRA. I applaud the requirement of passage of the competency examination administered by the North American Board of Naturopathic Examiners (NABNE), known widely as the Naturopathic Physician Licensing Exam (NPLEX).

Additional points of clarification and suggestions include::

§18.905(b), refers to registrants who have not had clinical contact with patients for four (4) years or more shall demonstrate passage of the NPLEX within 12 months of application.

Add clarifying language specific to passage of NPLEX Part II - Core Clinical Science Examination, the relevant assessment for reactivation of registration.

Please update the required hours in § 18.904(b)(5) and § 18.905(b)(6) to be consistent throughout with 23 Pa.C.S. § 6383(b)(3)(i) (relating to education and training).

Thank you again for the opportunity to provide comments and feedback.

Sincerely,

Jessica Shoemaker  
432 Santa Anita Drive  
Dillsburg, PA 17019-8315



## Worthington, Amber

---

**From:** Bill Shuster <bshu987@yahoo.com>  
**Sent:** Sunday, July 2, 2023 10:43 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] COMMENTS ON 16A-4953-NATUROPATHIC DOCTORS ANFR

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To: Ms Shana M. Walter, Esquire

Dear Ms Walter,

I am writing to express how much my Neuropathis Practioner has helped me and the list is far too long to note here. One example though is as follows: My primary care health physian had said that my blood pressure was getting to the point where medication would be required. This is when I first saw my Neuropathic Practionor and began the prescribed protocol. I began monitoring my BP on a daily basis and within several weeks it dropped to a very good level. My next appointment with my primary care physician proved this to be true and I do not need prescription medication. This was a year and a half ago. As I stated earlier, this is only one example in my life and can't even begin to imagine how many other people have been helped with health issues by Nueropathic Practioner.

I urge/beg/plead to you to look closely at the good being done by these caring professionals before taking any action Great damage can be done and it is within your power to seek the truth about this. Many, many of us have been helped tremendously and that could stop at your desk.

Sincerely,  
Bill Shuster



Shana M. Walter, Counsel

State Board of Medicine

SMW

Enclosure

cc: Saiyad Ali, Board Administrator, State Board of Medicine

Mark R. Zogby, Esquire, Prosecution Division

WILLIAM MARTIN SLOANE  
ATTORNEY & COUNSELLOR AT LAW  
417 WEST SOUTH STREET  
CARLISLE PA 17013-2829, USA

DBA EdD JD LLM-Labor PhD DCL  
Maryland and Pennsylvania Bars

(+1) 717 249 1069  
sloane@lawyer.com

3 July 2023

Shana M. Walter, Esquire  
State Board of Medicine  
[RA-STRegulatoryCounsel@pa.gov](mailto:RA-STRegulatoryCounsel@pa.gov)

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

To the State Board of Medicine (hereinafter “Board”):

We understand the principle that, because the Independent Regulatory Review Commission (IRRC) has already reviewed the regulations, comments to the Advanced Notice of Final Rulemaking should be limited to the definitions and changes requested by IRRC. As indicated below, however, several other issues must be addressed.

INTRODUCTION. Act 128 of 2016, P.L. 997, allowed registration of certain practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". Our organization, incorporated in 2013, represents traditional naturopaths, who are not required to register.

❶ § 18.13a(e) requires a license before “recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions.” *The General Assembly has never imposed this requirement on anyone*; if they had, then the clerks in GNC stores (and every mother) would be liable to prosecution.

❷ § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’” By negative implication, only registered naturopathic doctors may use the abbreviation ‘N.D.’ *The General Assembly specifically refrained from enacting title protection for the abbreviation ‘N.D.’* The Board would prohibit traditional naturopaths from stating that they earned an N.D. degree.

❸ In § 18.902, the definitions of ‘NATUROPATHIC MEDICINE’, ‘NATUROPATHIC SERVICE’, and ‘NATUROPATHIC THERAPIES’ are so extremely broad as to encompass every function performed for decades by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. This entire section is ultra vires: *The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the Board to do so.*

❹ § 18.907 allows non-registered practitioners to use “naturopath”, “traditional naturopath”, or “any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board.” Implies to whom? *The General Assembly does not prohibit traditional naturopaths from calling themselves ‘doctor of naturopathy’ or using the post-nominal ‘N.D.’*, but the Board fails to define “similar title” or to spell out what titles imply board registration. This violates Fourteenth Amendment Due Process by forcing traditional naturopaths to guess, at their own peril, what the Board thinks that ‘N.D.’ implies. A simpler solution would be to prohibit non-registered practitioners from falsely stating that they are registered, just as non-licensed professional counselors are prohibited from falsely stating that they are licensed professional counselors.

PENNSYLVANIA TRADITIONAL NATUROPATHS ASSOCIATION (PATNA)  
BY: *William Martin Sloane*, President



**From:** [Kris Stroup](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Support for my ND  
**Date:** Friday, June 30, 2023 2:16:42 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. I am an active client of hers and she has helped me so much overcoming a lot of health issues, ones that a medical doctor would have subscribed meds upon meds upon meds and I won't subject my body to that kind of abuse.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy'

and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Kris Stroup

## Worthington, Amber

---

**From:** Judy Todd <judytodd50@gmail.com>  
**Sent:** Friday, June 30, 2023 7:11 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External]

**ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Here is info on what a traditional naturopath is if you want to read and use in your letter or just become familiar with the term. [Naturopathic Doctor - PA Traditional Naturopath Association \(panaturopaths.com\)](http://panaturopaths.com)



[PA Traditional Naturopath Association](http://panaturopaths.com)

Doctors of Traditional Naturopathy have been around since the 1800s, a system of the Healing Arts and Drugless Healthcare .

[panaturopaths.com](http://panaturopaths.com)

Betty Magill, ND  
C-Life, Inc.  
*Living Healthy, Healthy Clean*  
C-Life, Inc.  
Betty Magill, ND  
265 Shoaf Road  
Smithfield, PA 15478  
724-564-9013  
[www.C-LifeInc.com](http://www.C-LifeInc.com)

**From:** [Michelle Tucker](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] Re: 16A-4953 Naturopathic Doctors Draft Annex and ANFR - State Board of Medicine  
**Date:** Sunday, July 2, 2023 11:18:20 PM

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Dear Shana,

Thank you for the opportunity to review and provide comment on the Naturopathic Doctors Draft Annex for the regulation of Naturopathic medicine in PA.

I am dissatisfied with the wording and licensure of a naturopathic doctor in the state of PA, according to this draft. I do hold a legitimate doctor of Naturopathic medicine degree, in which the education and the training have allowed me to be a "physician" in other states. In PA, it has been very difficult to be a Naturopathic doctor. The rule of a naturopathic doctor includes the "practice of medicine". We use natural medicine modalities to help with patient care and with very favorable outcomes.

The definition of a "physician" is someone who has been through medical school and can provide medical care and treatment, make diagnoses, and prescribe medication. In 2 other states besides PA, I have carried a medical license designating me as a physician. Going through the medical training I have, I feel confident that I am both a doctor and a physician.

I have over 20 years of Naturopathic medical experience and I feel this is undermining my education and my experience. My degrees and medical training validate my ability to treat patients as a physician.

I am curious, a traditional Naturopath in PA and a Naturopathic Doctor, what will be the difference in providing care? The traditional Naturopath, who has no clinical experience and board exams will have the ability to treat the same as I will, who have done a lot more training and clinical experience with passing multiple modality board exams.

What and how is this going to advance true naturopathic doctors in PA?

Without the ability to diagnose, write prescriptions, and order labs, how does this allow us to best treat our patients to our fullest ability?

Currently, I am in the prime of my career, given all the experience I have. I want to be able to offer my patients all that they deserve from a physician. Adding "doctor" after my name does not allow me to be able to do that for my patients. Naturopathic medicine and Allopathic medicine should be seen as equal, as we approach the patient's treatment in different ways. Patients should be able to utilize both, equally.

If someone has a naturopathic "physician" status in another state and all requirements have been met, they should be able to qualify for a "physician" status here in PA. I want to be able to further my "practice" to continually offer patients the best natural medicine that is available,

and this regulation seems like it will fall short of that. I feel that I am being limited and restricted.

Thank you,  
Michelle Tucker, ND, Practitioner of Oriental Medicine

On Tue, Jun 6, 2023 at 2:10 PM ST, RegulatoryCounsel <[RA-STRegulatoryCounsel@pa.gov](mailto:RA-STRegulatoryCounsel@pa.gov)> wrote:

Dear Stakeholders and Commentors:

Attached for your review is a draft Annex of the regulation on Naturopathic Doctors and a copy of the ANFR which was published on June 3, 2023, at 53 Pa. B. 2961, in the [Pennsylvania Bulletin](#), requesting additional public comment within 30 days (or by July 3, 2023), and discussed at the State Board of Medicine (Board) meeting on April 18, 2023.

In order for the Board to solicit meaningful public input, the Board desires your comments on this draft. Please e-mail your comments to me, no later than **July 3, 2023**, so that they can be forwarded to the Board for consideration at its **July 18, 2023**, meeting.

Sincerely,

/s/ SHANA M. WALTER

Shana M. Walter, Counsel  
State Board of Medicine

SMW

Enclosure

cc: Saiyad Ali, Board Administrator, State Board of Medicine  
Mark R. Zogby, Esquire, Prosecution Division

**From:** [Wallace, Felicia](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Cc:** [Kauffman, Rob](#); [Dawn Keefer](#); [Zimmerman, David](#); [Fink, Wendy](#); [Gleim, Barbara](#); [Borowicz, Stephanie](#)  
**Subject:** From the Office of Senator Doug Mastriano - Proposed Rule Change - Naturopathic Doctors  
**Date:** Thursday, June 29, 2023 5:01:55 PM  
**Attachments:** [Response Naturopathic Proposed Rule Change .pdf](#)  
**Importance:** High

---

Good Afternoon Attorney Walter,

Please see the attached letter in response to the **Proposed Rule Change (PA Bulletin 21-2112) Naturopathic Doctors- 16A-4953 – Registration of Naturopathic Doctors**. We trust this letter will also be forwarded to

Mark B. Woodland, MS. M.D. Chair of the State Board of Medicine, accordingly.

Sincerely,

Felicia M. Wallace

Felicia M. Wallace | Executive Assistant  
Senator Doug Mastriano  
170 Main Capitol Building | Senate Box 203033  
Harrisburg PA 17120-3033  
Phone: 717.787.5806 | Fax: 717.772.2753  
[fwallace@pasen.gov](mailto:fwallace@pasen.gov)

**33RD SENATORIAL DISTRICT**

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FAX: 717-772-2753
- 37 SOUTH MAIN STREET, SUITE 200  
CHAMBERSBURG, PA 17201  
PHONE: 717-264-6100  
FAX: 717-264-3652
- 33 YORK STREET  
GETTYSBURG, PA 17325  
PHONE: 717-334-4169  
FAX: 717-334-5911



**Senate of Pennsylvania**

**DOUG MASTRIANO  
SENATOR**

June 29, 2023

Mark B. Woodland, M.S., M.D., Chair  
c/o Shana Walter, Esq., Counsel  
State Board of Medicine  
P.O. Box 69523  
Harrisburg, PA 17106-9523

Re: Follow up to letter OPPOSING proposed rule change (PA Bulletin 21-2112) Naturopathic Doctors - 16A-4953 - Registration of Naturopathic Doctors

Dear Dr. Woodland:

On January 14, 2022, I wrote to you during the initial comment period opposing the proposed rule change to **16A-4953 - Registration of Naturopathic Doctors** and have yet to receive a response from your office. This letter incorporates by reference, as if fully set forth herein, our prior letter of opposition and submits both prior to the July 3, 2023, final comment period deadline.

Your rule change proffer is in direct contravention to Pennsylvania statutory law and the rights of thousands of Pennsylvanians to access traditional naturopathic medicine because it bans recognized and certified naturopathy doctor programs and degrees and as such acts as a prior restraint on speech and not mere conduct. Indeed, no actual concerns for practice, procedures, specific remedies or other matters are even mentioned in your rule change.

PA statute does not confer upon you the right to make new law and limit the use of the terms Doctor of Naturopathy or N.D. as you intend to do. Such action by your office is *ultra vires* and violates the rights of naturopathy doctors and the People of Pennsylvania to make their own health choices in accessing their own therapies and treatments for the pain, illnesses, disabilities and conditions that they alone are experiencing.

Instead of considering our reasonable requests for you to follow the law and not override the use of terms not prohibited by the Commonwealth nor delegated to your office to limit, this rule change will harm thousands of Pennsylvanians. Your attempt to ban a broad spectrum of modalities, including vagueness of language that could

**COMMITTEES**

VETERANS AFFAIRS & EMERGENCY  
PREPAREDNESS, CHAIR  
EDUCATION COMMITTEE, VICE CHAIR  
AGRICULTURE & RURAL AFFAIRS  
GAME & FISHERIES  
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INSTAGRAM.COM/SENATORMASTRIANO/



be interpreted by an overzealous board to ban services of which include referrals to “non-licensed” professionals and creating an allopathic model that totally guts the traditional naturopathic medicine approach, is requested to be immediately suspended. More careful and legitimate word crafting is needed prior to the passage of such a sloppily written regulation change clearly violating WOODLAND, Re: letter OPPOSING proposed rule change (PA Bulletin 21-2112) Naturopathic Doctors

Supreme Court precedent on procedure and proscriptions on administrative and statutory restraint on liberty interests via licensing procedures. This rule proposal is leaving thousands in the dark because of its vagueness and prior restraint violations of the constitutional proscriptions on state burdens on fundamental liberty interests. The Supreme Court has repeatedly ruled in support of those burdened by improper statutory and administrative rulemaking:

The State asserts that if the licensing officer acts arbitrarily, capriciously, or corruptly, his action is subject to judicial correction. Counsel refers to the rule prevailing in Connecticut that the decision of a commission or an administrative official will be reviewed upon a claim that 'it works material damage to individual or corporate rights, or invades or threatens such rights, or is so unreasonable as to justify judicial intervention, or is not consonant with justice, or that a legal duty has not been performed.' It is suggested that the statute is to be read as requiring the officer to issue a certificate unless the cause in question is clearly not a religious one; and that if he violates his duty his action will be corrected by a court.

To this suggestion there are several sufficient answers. The line between a discretionary and a ministerial act is not always easy to mark, and the statute has not been construed by the State court to impose a mere ministerial duty on the secretary of the welfare council. Upon his decision as to the nature of the cause, the right to solicit depends. Moreover, the availability of a judicial remedy for abuses in the system of licensing still leaves that system one of previous restraint which, in the field of free speech and press, we have held inadmissible. **A statute authorizing previous restraint upon the exercise of the guaranteed freedom by judicial decision after trial is as obnoxious to the Constitution as one providing for like restraint by administrative action.**

*Cantwell, et al v. Connecticut*, 310 U.S. 296, 60 S.Ct. 900, 84 L.Ed. 1213 (1940), (citing, *Near v. Minnesota*, 283 U.S. 697, [51](#) S.Ct. 625, 75 L.Ed. 1357 (1931))(bold emphasis added).

The Court further issued a binding limitation on rule making which makes practitioners such as Naturopathy Doctors liable to the state, mandating constitutional guarantees which are not met here in these proposed rule changes:

“in the absence of a statute narrowly drawn to define and punish specific conduct as constituting a clear and present danger to a substantial interest of the State, the petitioner's communication, considered in the light of the constitutional guarantees, raised no such clear and present menace to public peace and order as to render him liable to conviction of the common law offense in question.

*Id.*; citing, *Schenck v. United States*, [249 U.S. 47, 52](#), 39 S.Ct. 247, 249, 63 L.Ed. 470 (1919). WOODLAND, Re: letter OPPOSING proposed rule change (PA Bulletin 21-2112) Naturopathic Doctors

As you are aware, Doctors of Naturopathy, or N.D., have specific training and expertise not studied or trained by those who are granted their M.D.s. Yet the proposed rules also propose to change and limit the scope of naturopathic knowledge, arrogating to the licensure Board consisting of M.D.s a system that excludes the N.D.'s wholistic naturopathy individualistic approach, and thereby creates a vagueness in violation of the constitution and laws of PA. Where in the state statute is the Board granted the authority to define and limit the title earned by non-PA institutions?

Additionally, where in the statute is your office authorized to prevent referrals by N.D.'s to herbalists who specialize in offering whole plant foods and remedies? Finally, upon what standard of care is the Board resting its decisions when such an action undermines the very nature of individualized naturopathy medicine?

Your immediate suspension of the planned rules and learned responses to this inquiry is requested. Thank you.



Senator Doug Mastriano  
33<sup>rd</sup> District



Representative Rob Kauffman  
89<sup>th</sup> Legislative District



Representative Dawn Keefe  
92<sup>nd</sup> Legislative District



Representative Barbara Gleim  
199<sup>th</sup> Legislative District



Representative Dave Zimmerman  
99<sup>th</sup> Legislative District



Representative Stephanie Borowicz  
76<sup>th</sup> Legislative District



Representative Wendy Fink  
94<sup>th</sup> Legislative District

## Worthington, Amber

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**From:** Heidi Weinhold <drheidiproducs@aol.com>  
**Sent:** Friday, June 30, 2023 11:47 AM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4593-Naturopathic Doctors ANFR  
**Attachments:** Heidi\_Comments\_16A-4953.pdf; AANMC Letter to PA Medical Board 6.21.23 2.pdf

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Dear Board Counsel,

Thank you for your efforts to complete the rules and regulations process for Naturopathic Doctors and to ensure protection of the citizens of Pennsylvania. I am also attaching the letter from the AANMC. I think this organization did an excellent job summarizing the issues regarding public safety and naturopathic medicine.

Thank you for your time and consideration.

Sincerely,

Heidi Weinhold ND

June 27, 2023

Shana M. Walter  
Board Counsel  
Pennsylvania State Board of Medicine  
P.O. Box 69523  
Harrisburg, PA 17106-5923  
RA-STRegulatoryCounsel@pa.gov

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

Dear Board Counsel:

My name is Heidi Weinhold ND and I completed a four-year doctoral program in Naturopathic Medicine from Sonoran University of Health Sciences in Tempe, Arizona. I served 12 years, as the legislative chair for the Pennsylvania Association of Naturopathic Physicians (PANP), working with legislators to promote legislation to license Naturopathic Doctors in Pennsylvania. A giant step towards this effort was achieved with the passage of House Bill 516 in 2016. HB 516 provides title protection and registration for Naturopathic Doctors graduating from accredited Naturopathic Medical Colleges. I would like the opportunity to offer the following comments:

**The Language of 16A-4953 is inconsistent with both the statutory language and the legislative intent of HB 516.**

**Section 18.907 (b), page 12: An individual who has not registered with the Board may claim to be, and hold himself out as a naturopath, traditional naturopath, and use any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the board**

Differentiating the two groups was the basis of HB 516, which protects the titles "Naturopathic Doctor" and "Doctor of Naturopathic Medicine". Per the language of the statute, those titles are reserved for NDs who have attended accredited naturopathic medical schools and have passed national competency exams. This is consistent with the other 26 US jurisdictions that currently license or register Naturopathic Doctors (NDs), where "ND" is the universally recognized abbreviation for

**Naturopathic Doctor.** If lay practitioners continue to use the ND designation behind their name there is a risk of causing confusion. They will be considered Naturopathic Doctors by the public, **without** having formal training.

If the lay practitioners would like the ability to have their credentials recognized in Pennsylvania, then they should go through the **legislative process**. My colleagues went through the legislative process for over 15 years, hired a lobbyist, and established **strict guidelines** that must be met in order to be called a ND in Pennsylvania.

A lay practitioner who has not achieved a doctoral level education would never be allowed to use the term 'osteopath' or 'chiropractor' because it would imply that individual was a 'Doctor of Osteopathic Medicine' or a 'Doctor of Chiropractic Medicine'. The legislative intent of HB 516 was to **protect** the public. My colleagues were told repeatedly by the Board of Medicine that if the term wasn't mentioned in the statute that it could not be written in the regulations. It is unclear why the Board of Medicine would seek, to protect and actually provide title to the lay practitioners, particularly titles that they are **not** qualified to use. This draft would be giving a title of 'naturopathy' or 'traditional naturopath' to a group of individuals that **do not have a standardized accreditation**.

**I strongly recommend that section 18.907 (b) on page 12 be removed from the regulations.**

**Section 18.902. Definitions. Page 5, Line 6: CNME-Council on Naturopathic Medical Education- The accrediting body which accredits schools (insert the wording: AND PROGRAMS) of naturopathic medicine for the education of naturopathic doctors.**

**Section 18.905. Inactive Status; reactivation of inactive or expired registration. P.11 (a) An naturopathic doctor may request in writing that the Board place the registration on inactive status. Confirmation of inactive status will be forwarded to the registrant. A naturopathic doctor may not use the title of "naturopathic doctor", "doctor of naturopathic medicine" or any other term implying that the individual is currently registered as a naturopathic doctor while on inactive status.**



**(p11) (2) Disclose whether the registrant used the title of “naturopathic doctor”, “doctor of naturopathic medicine” or any other term implying that the individual was currently registered as a naturopathic doctor in the Commonwealth of Pennsylvania while the registration was inactive or expired.**

If a Naturopathic Doctor wishes to lecture or write, why would the individual lose the esteem of their degree?

A Doctorate earned, is a doctorate kept. This appears to be a very exceptional case, limited to Naturopathic Doctors. There are stipulations that if a Naturopath leaves clinical practice for four years, that he/she must sit for the boards. This provision should be adequate protection for the public. Retired dentists, medical doctors, and specialists are still using doctor before their names.

**Section 18.905. Inactive Status; reactivation of inactive or expired registration. P.11 (b) should be changed to (c) A registrant who has not had clinical contact with patients for 4 years or more shall demonstrate current competency and qualification to hold forth as a naturopathic doctor by demonstrating a passing score on NPLEX examination, completed within 12 months of the application to reactivate the registration.**

Recommend amending this section for clarification. Please change the wording to “demonstrating a passing score on the NPLEX Part II Clinical examination.”.

**Page 12 (c) change to (d) Payment of applicable fees...**

**Section 18.908. Informed consent and disclosure of financial interests. P13. (b) A naturopathic doctor shall disclose to patients and prospective patients if the naturopathic doctor receives any commission, rebate, referral fee or similar financial incentive in connection with ANY MARKETING ACTIVITY.**

Any marketing activity is really broad. My colleagues are concerned that this opens the door to too many avenues to take action against a Naturopathic Doctor. On page 6 **MARKETING ACTIVITY- is defined as –A COMMUNICATION ABOUT A SERVICE OR MERCHANDISE THAT ENCOURAGES RECIPIENTS OF THE COMMUNICATION TO**

**PURCHASE OR USE THE MERCHANDISE OR SERVICE. FOR PURPOSES OF THIS CHAPTER, THE TERM DOES NOT INCLUDE A SERVICE FROM A HEALTH CARE PRACTITIONER.**

This discourages Naturopathic Doctors from being interviewed, writing a blog, etc.

**Merchandise on page 6 is defined as –Items that can be sold including vitamins, supplements, food, food extracts, homeopathic remedies, botanical medicines, herbs, and natural substances.**

**Section 18.913 Grounds for discipline. Page 21. (6) Promoting the sale of services, drugs, devices, appliances, or goods to a patient so as to exploit the patient for financial gain.**

I strongly encourage removing Section 18.913 (6). Some naturopathic doctors choose to carry supplements and botanical products that are difficult for patients to procure in their office as a convenience to patients. The regulations require a Naturopathic Doctor to have patients sign a written informed consent and reveal any financial disclosures. **Section 18.908, p.13. Informed consent and disclosure of financial interests** is a provision in the regulations that should be adequate protection for the public.

Other medical doctor offices, specialists, and doctors of chiropractic medicine are now carrying products, drugs, and devices in their office for sale. Why would Naturopathic Doctors be the exception?

Thank you for your efforts to complete the rules and regulations process for Naturopathic Doctors and to ensure protection of the citizens of Pennsylvania. Thank you for your time and consideration.

Sincerely,

*Heidi Weinhold ND*

Heidi Weinhold ND  
2400 Ansys Drive, Suite 102  
Canonsburg, PA 15317

## Worthington, Amber

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**From:** Amanda Whetsel <mandywhetsel@yahoo.com>  
**Sent:** Monday, July 3, 2023 11:39 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that



he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely, Amanda Whetsel

## Worthington, Amber

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**From:** Jamie Kaufman <jk\_mimi@yahoo.com>  
**Sent:** Sunday, July 2, 2023 7:04 PM  
**To:** ST, RegulatoryCounsel  
**Subject:** [External] Comments on 16A-4953 – Naturopathic Doctors ANFR

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Dear Ms. Walter:

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More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

The State Board of Medicine has proposed regulations that would impair my healthcare.

1. § 18.13a(e) requires a license before "recommending herbs, minerals and other supplements, or combinations, according to traditions other than Oriental medicine traditions." The Generally Assembly has never imposed this requirement on anyone; if they had, then the clerks in every GNC store (not to mention millions of mothers) would be liable to prosecution by the State.

2. § 18.15(d) provides that "an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title 'Doctor of Naturopathic Medicine,' 'Naturopathic Doctor' or the abbreviation 'N.D.' in addition to the title 'acupuncturist.'" By negative implication, only registered naturopathic doctors may use the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that

he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,

Jamie Kaufman Williams

**From:** [Mark Willis](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR." Deadline for e-mails: Monday, July 3, 2023  
**Date:** Friday, June 30, 2023 10:09:38 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. Her practice has minimized symptoms of my IBS and causes me to miss less work due to illness.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.). Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

My naturopath is a traditional practitioner and is not required to register with the State. It needs to be made clear that a traditional naturopath can use the title ND. This title gives me the assurance I am getting the care I am looking for and would confuse the public if it were not there. Without this title, many who seek this type of help would not know where to find it.

This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents.

**The State Board of Medicine has proposed regulations that would impair my healthcare.**

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2. § 18.15(d) provides that “an individual licensed as an acupuncturist who also possesses a current and active registration as a naturopathic doctor may utilize the title ‘Doctor of Naturopathic Medicine,’ ‘Naturopathic Doctor’ or the abbreviation ‘N.D.’ in addition to the title ‘acupuncturist.’” By negative implication, only registered naturopathic doctors may use

the abbreviation 'N.D.' This means that my doctor can no longer truthfully communicate the fact that he/she has earned an N.D. degree. The General Assembly specifically refrained from enacting title protection for the abbreviation 'N.D.' This punitive measure makes it appear that my N.D. has done something wrong to have this credential taken away, makes it less likely that patients will locate and consult him/her, and may cause him/her to cease practicing a lawful profession due to loss of income.

3. In § 18.902, the definitions of 'NATUROPATHIC MEDICINE', 'NATUROPATHIC SERVICE', and 'NATUROPATHIC THERAPIES' are so extremely broad as to encompass every function performed by traditional naturopaths. By negative implication, only board-registered doctors of naturopathic medicine may perform these functions. The General Assembly never passed a scope-of-practice act for Naturopathy, and there is no enabling legislation authorizing the State Board to do so.

4. § 18.907 allows non-registered practitioners to use "naturopath", "traditional naturopath", or "any similar title implying that the individual practices naturopathy so long as the title does not also imply that the individual is a naturopathic doctor registered with the Board." This is the big Catch-22: The General Assembly allows traditional naturopaths to call themselves 'doctor of naturopathy' and use the post-nominal 'N.D.', but the Board fails to define "similar title" or to spell out what titles imply board registration. This violates Due Process by forcing naturopaths to act at their own peril.

Thank You for Your Consideration.

Sincerely,  
Mark Willis  
291 Willis Road  
Jefferson Pa 15344

--

Mark Willis

*"Try not to be a man of success but a man of value" Albert Einstein.*

**From:** [Nancy Ziemkowsky](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Subject:** [External] "Comments on 16A-4953 – Naturopathic Doctors ANFR."  
**Date:** Friday, June 30, 2023 6:59:16 PM

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Dear Ms. Walter:

I am a client of a Doctor of Naturopathy (N.D.) in Fayette County. She has been in practice for 15 years. My N.D. has helped me to maintain good health without prescription drugs or surgery. She was able to help me when the medical doctors were unable to find the root cause of my health concerns. My health has improved significantly and I have my life back thanks to my N.D.

More than a century after Naturopathy was founded, a new profession came on the scene. These are allopathically oriented Doctor of Naturopathic Medicine (generally N.M.D.. Act 128 of 2016, P.L. 997, allowed registration of these new practitioners and gave them protection for the titles "naturopathic doctor" and "doctor of naturopathic medicine". These are not the kind of naturopaths whom I wish to consult; if I have an illness or injury that needs diagnosis and treatment, I will go see a qualified Doctor of Medicine (M.D.).

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This could affect the income stream of naturopaths and force them to close their doors affecting the health care of many PA residents and

they are helping people find natural solutions and helping them to make lifestyle changes that are improving their overall health. However, the State Board of Medicine has proposed regulations that would impair my healthcare.

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Thank You for Your Consideration.

Sincerely,

Nancy Ziemkowsky, RN