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Subject: [External] 16A-4953 Naturopathic Doctors Draft Annex and ANFR - State Board of Medicine
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Ms. Walter,

Attached is the letter of the views of the American Naturopathic Association in response to 16A-4953.

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8 June 2023

Shana M. Walter, Counsel
PA, State Board of Medicine

Thank you, Ms. Walker, for this opportunity for input on the decision that the Pennsylvania Legislature is looking at making in the regulation of Naturopathy. I am the President of the American Naturopathic Association which represents Naturopathic Doctors around the country wishing to be recognized and registered health practitioners in each of our respective states—separate from the AANP (those who have completed separate education granting the title NMD (Naturopathic MEDICAL Doctor)—emphasis mine). For better understanding, let me give you a brief history of the schism between Naturopaths.

The ANA was formed in 1919 by Dr. Benedict Lust as an organization to bring together those specializing in treatments found in nature (Air, water, heat, cold, light, touch) to promote our practices. In 1929, U.S. Congress passed legislation recognizing and defining Naturopathy as “any system of healing that does not resort to the use of drugs, conventional medicine, or operative surgery for the prevention, relief, or cure of and disease”. This was signed by President Calvin Coolidge. The schism began in 1942 when a “split” developed between Naturopaths and their philosophies. That split resulted in the formation of an organization that would become the American Association of Naturopathic Physicians, who would form their own education standards (the “Bastyr Schools”) and exam (the NPLEX). This group aligns itself closer to conventional (Western) medicine and shuns those who pursue educational opportunities not part of their network. Those who still hold true to the teachings and philosophy of Dr Lust’s “Nature Cure” are represented by the ANA. Those who are members of this organization must show 4100 hours of education and 1500 hours of clinical work to qualify for membership.

As written, this Draft Annex would severely limit the practice of many in the State of Pennsylvania. There are many of us who graduated from institutions with Naturopathic Doctoral degrees who do not hold to the ideals of AANP nor have completed training to be called NMD’s. We applaud the idea of Registered Naturopathic Doctors and suggest a slightly different strategy than what is outlined in this draft. Instead of limiting registration to those who have pursued one set of education, allow those who can show 4100 hours of education

above a bachelor's degree to become registered and may use Registered Naturopathic Doctor. These ND's must show that they have taken a certification exam such as, but not limited to, the NPLEX (Administered by the NABNE) OR the NDLEX (Administered by the National Board of Naturopathic Examiners (NBNE <https://www.naturopathyboard.com>). Those who have taken the NPLEX may then call themselves NMDs and practice with the blessing of the state and those who have taken the NDLEX may call themselves Registered Naturopathic Doctors (RNDs). We have found in other instances that the NMD training and philosophy is different than the training and philosophy of a traditional Naturopath. That difference highlights why separate registration/licensure is needed.

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