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C.P. NEGRI, OMD, ND ◆ NATURAL HEALTHCARE AND ACUPUNCTURE

8 June 2023

Shana M. Walter, Esq.  
Board Counsel, State Board of Medicine.  
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**Re: 16A-4953 – Naturopathic Doctors ANFR**

Dear Ms. Walter:

I have been a licensed acupuncturist in Pennsylvania for many years. I am also licensed in West Virginia, where I have been appointed to the State Board of Acupuncture and Oriental Medicine by four different governors over the years.

It so happens that I also hold a naturopathic degree, although I have never practiced as a naturopath in Pennsylvania.

I thought you might like some insight into what is happening with this proposed rulemaking, as I am familiar with this process.

The Pennsylvania Naturopathic Doctor Registration Act names the North American Board of Naturopathic Examiners (NABNE) as the sole organization administering a qualifying exam.

For the Medical Board's information: A different agency, the National Board of Naturopathic Examiners in Washington DC, is the oldest extant body (1951) for testing naturopathic graduates and predates the NABNE (again named in the proposed rule) by several decades.

There have been previous attempts to establish other examination boards as the only criterion for registration or licensure (and specifically excluding the NBNE), which failed. Wendell vs Spenser was the landmark Supreme Court decision (1954) that established that the NBNE was a valid source of certification and could not be excluded. The Pennsylvania Board of Medicine and Regulatory Council is obviously unaware of this.

The pared-down explanation is this: **One clique in the profession wants sole recognition and therefore a monopoly on naturopathic practice in the Commonwealth.**

By amending the language so that acupuncturists (a completely different licensed group) cannot use the term Doctor of Naturopathy or ND unless they happen to be in this clique's circle, they effectively stifle the use of these titles by naturopaths who are not registered and who predate them. This has nothing to do with acupuncturists; this has to do with stifling competition from traditional naturopaths.

*What problem is this rule trying to correct?* How many acupuncturists are confusing the public? I don't personally know a single other acupuncturist in Pennsylvania who is also a naturopathic doctor besides myself. If the proposed rule is promulgated just on my behalf, I would feel oddly flattered. But I am insignificant compared to the many traditional naturopaths throughout Pennsylvania who would now be at risk if this seemingly benign rule is put in place.

Thank you for your time.

Yours most sincerely,

A handwritten signature in black ink that reads "C.P. Negri, OMD, ND". The signature is written in a cursive, flowing style.

C.P. Negri, OMD, ND