



From: [lisa baas](#)
To: [ST, RegulatoryCounsel](#)
Cc: [Ali, Saiyad](#); [Zogby, Mark](#)
Subject: [External] Re: 16A-4953 Naturopathic Doctors Draft Annex and ANFR - State Board of Medicine
Date: Tuesday, June 13, 2023 5:02:54 PM
Attachments: [Shana M.docx](#)

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On Jun 6, 2023, at 2:10 PM, ST, RegulatoryCounsel <RA-STRegulatoryCounsel@pa.gov> wrote:

ANFR which was published on June 3, 2023, at 53 Pa. B. 2961, in the [Pennsylvania Bulletin](#),

Shana M. Walter, Counsel
State Board of Medicine

RE: PUBLIC COMMENT ON..ANFR which was published on June 3, 2023, at 53 Pa. B. 2961, in the Pennsylvania Bulletin,

I WOULD LIKE TO KNOW WHAT THE FEAR AND DANGER IT IS TO THE PUBLIC THAT IS ALLEVIATED BY WEARING A NAME TAG.?

AS AN ACUPUNCTURIST HERBALIST (NON Ph.D.) all of my advertising , website, social media marketing, has to correctly state my credentials. I have gone to school long enough to get a Ph.D. in Acupuncture & Oriental Medicine. I have two bachelor's degrees and a masters. I am not interested in becoming a PhD acupuncturist... I have more credentials and experience than the newly minted PhD. Students that I have taught for over 10 years, but I do object to having to wear a name tag so the public does not confuse me with a doctor of medicine MD.

All laws protecting the public from false advertising and credentialing already exist. If I make false claims about my credentials I can be sued and I am sure have my license revoked.

This micro managing by way of name tags will do little or nothing to save the public from misrepresentation. And has misrepresentation studied and found to be an actual threat? And to what degree?

The danger of misrepresentation already has its remedies within the law. Additional labeling will be a band aid on whatever miniscule threat is perceived. Why don't you make sure that all PhD.'s of all genres wear badges, and nurses and PT's..where /when will this end?

All acupuncturists and herbalists are required to refer out to professionals when things are beyond their scope of practice. I feel this law is nothing more than micromanaging and controlling out of unsubstantiated fear.

Why don't' you work with the acupuncture schools to make sure their new PhD students do not represent themselves as doctors. This might go a long way to nipping this fear in the bud.

All the best!

Lisa Baas B.A., B.S., M.PS. L.OM