



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



June 30, 2023

The Honorable George D. Bedwick, Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th 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

Worthington, Amber

From: Linn Wheeling <engagement@naturopathic.org>
Sent: Tuesday, June 27, 2023 11:27 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 – Naturopathic Doctors ANFR
Attachments: Comments on 16A-4953 - AANP 2023.pdf

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Attention: Shana M. Walter, Board Counsel, State Board of Medicine.

The American Association of Naturopathic Physicians is providing the attached comments and feedback to the PA Medical Board for their consideration.

Thank you for your time and attention to this matter. If you have any questions, please feel free to contact me directly.

Sincerely,

Linn J. Wheeling, CAE, MBA PRONOUNS: She, Her, Hers
Director Community Engagement
American Association of Naturopathic Physicians
Direct Line: 202-849-6311 ext. 1003 | www.naturopathic.org
300 New Jersey Ave NW, Suite 900 | Washington, DC 20001

engagement@naturopathic.org



June 20, 2023

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

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

The American Association of Naturopathic Physicians (AANP), the national professional association representing licensed Naturopathic Doctors (NDs), fully supports registration of Naturopathic Doctors in Pennsylvania. As in 2019, 2021 and 2022, we appreciate the opportunity to provide comments to assist the State Board of Medicine in crafting language that is consistent with the Naturopathic Doctor Registration Act (NDRA) and necessary for the administration, compliance, and enforcement thereof. We once again share the following concerns and request they be addressed forthwith.

The primary purpose of registration is to ensure Pennsylvania citizens who wish to avail themselves of the services of a Naturopathic Doctor, they can be confident a practitioner using the “ND” designation has achieved a uniformly accepted minimum threshold of educational requirements and has passed nationally recognized competency exams. As the Pennsylvania legislature clearly recognized with the enactment of the NDRA (2016), there are clear distinctions between licensed or licenseable Naturopathic Doctors who attend accredited naturopathic medical programs and are qualified to practice naturopathic medicine - and those referred to as lay naturopaths.

§18.907. Acceptable titles and professional designations by registrants and non-registrants; prohibited titles language is contrary to and inconsistent with the plain language of the NDRA.

Per the plain language of the statute, the titles Naturopathic Doctor, Registered Naturopathic Doctor, or Doctor of Naturopathic Medicine are reserved for Naturopathic Doctors who must meet ALL of the requirements for registration, specifically, holding a doctor degree from a naturopathic school accredited by the Council on Naturopathic Medical Education (CNME), and passage of Parts I and II of the Naturopathic Physician Licensing Examination (NPLEX) administered by the North American Board of Naturopathic Examiners. This is consistent with the other 26 US jurisdictions that

currently license or register NDs. The inclusion of language conferring the use of similar titles to lay naturopaths directly conflicts with the intent and language of the NDRA.

RECOMMENDATION:

- **Amend 18.907(c) to incorporate the following shortened titles as follows:**

A naturopathic doctor who uses the designation “Dr.” shall further identify himself or herself as a “naturopathic doctor (ND), “registered naturopathic doctor (RND)” or “doctor of naturopathic medicine (DNM)” and may not use any term or designation that would imply that the naturopathic doctor is licensed or authorized to practice medicine and surgery, dentistry, podiatry, optometry, psychology, nursing, physical therapy, acupuncture, chiropractic, genetic counseling, athletic training, massage therapy or any other health care profession, unless that individual also holds a current and active authorization to practice the other profession issued by the appropriate licensing authority of this Commonwealth.

We would like to be exceptionally clear that the AANP is not opposed to lay naturopaths seeking their own regulatory framework as an entry level healthcare worker. The AANP recognizes that many of the therapies used by naturopathic physicians are not exclusive, including nutritional supplements, herbs, homeopathy, and physical forces. However, the titles Naturopathic Doctor, Registered Naturopathic Doctor, or Doctor of Naturopathic Medicine should be reserved for individuals who have earned a doctoral level degree in naturopathic medicine from institutions accredited by the CNME, which is recognized by the US Department of Education, as stated in the NDRA. Lay practitioners should not be included in any part of 16.4953.

Further points of clarification and recommendations:

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.

- **Recommendation: 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).

- **Recommendation: Update all required hours to reflect three (3) hours**

consistent with 23 Pa.C.S. § 6383(b)(3)(i).

We appreciate the opportunity to share our comments and thank you for the work you all are doing to further registration of NDs. We continue to support you and the ND community in Pennsylvania in advancing consistent and enforceable regulations to ensure the safe practice of naturopathic medicine in Pennsylvania.

I would be glad to answer any questions you may have, and I can be reached directly at 202-849-6306. Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink that reads "Laura Farr". The signature is written in a cursive style with a large initial "L" and "F".

Laura Culberson Farr
Executive Director

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Chris Mikec <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 9:30 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,

Chris Mikec
93 Roycroft Ave
Pittsburgh, PA 15228-1806

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Christopher Champion <mailagent@thesoftedge.com>
Sent: Monday, June 26, 2023 7:18 PM
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:

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

Sincerely,

Christopher Champion
2961 Manorview Cir
Allison Park, PA 15101-3137

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of cindy01@pa.metrocast.net
Sent: Tuesday, June 27, 2023 8:44 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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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::

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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,

Cindy Chuplis
PO Box 167 middleport pa 17953
Middleport, PA 17953-0167

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Danny Turner <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 4:40 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Additional requests include the following:

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

Sincerely,

Danny Turner
80 Hawk Lane,
Ephrata, PA 17522-8780

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Debra Kirchhof-Glazier <mailagent@thesoftedge.com>
Sent: Wednesday, June 28, 2023 7:30 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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

Sincerely,

Debra Kirchhof-Glazier
11099 Pond Rd
Huntingdon, PA 16652-7669

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Diana Meunier <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 9:26 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Additional points of clarification and suggestions include::

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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,

Diana Meunier
50 Jonquil lane
Levittown, PA 19055-2306

From: [Diana M](#)
To: [ST, RegulatoryCounsel](#)
Subject: [External] Comments regarding Registration of Naturopathic Doctors [51 Pa.B. 7877]
Date: Sunday, June 25, 2023 8:17:04 PM

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Hello:

I received a letter asking for public comments regarding advanced notice of final rule making in the registration of naturopathic doctors. I am not entirely sure what information or comments you are looking for from me. I am currently under the care of a naturopathic oncologist since 2020 when I was diagnosed with breast cancer. Prior to that I was under the care of a naturopathic doctor since 2014. They are both located in PA. My naturopaths are a very important part of my health care and I use them integratively with my medical oncologist and primary care doctor. Naturopathic doctors offer different perspectives than medical doctors and having them involved in my health care has been a positive experience. They should be licensed accordingly similarly to medical doctors.

Please let me know if further comments or clarification is needed.

Thank you,
Diana Meunier

From: [Dr. Yanez](#)
To: [ST, RegulatoryCounsel](#)
Subject: [External] AANMC Comment Regarding The Naturopathic Doctor Registration Act
Date: Friday, June 23, 2023 2:19:30 PM
Attachments: [AANMC Letter to PA Medical Board 6.21.23.pdf](#)

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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, please find our feedback regarding The Naturopathic Doctor Registration Act. Thank you for your consideration, I look forward to your response.

Dr. Yáñez

--

JoAnn Yáñez, ND, MPH, CAE
Executive Director
Association of Accredited Naturopathic Medical Colleges (AANMC)
director@aanmc.org
800-345-7454

Become the Doctor You Want to Have

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Shana M. Walter
Board Counsel
State Board of Medicine
P.O. Box 69523
Harrisburg, PA 17106-5923
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: [Gay Hilton](#)
To: [ST, RegulatoryCounsel](#)
Subject: [External] Shana M. Walter, Esq.
Date: Sunday, June 25, 2023 8:21:00 PM

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Dear Attorney Walter:

Over the past 20 + years that I have successfully been in practice as a traditional doctor of naturopathy, I find that we traditional ND's have had to continually do battle with a group who claim to be paramedical naturopathic practitioners. Having connected with several of these individuals, I dare say they are neither well prepared para- medical ND's , nor qualified medical naturopaths! Since the early 1980's they have been attempting to straddle two professions, allopathy and traditional naturopathy, and in the process are trying to carve out a new mixed breed of medical naturopathy. The edicts of traditional Naturopathy are to leave the practice of allopathy to MD's and the DO's. Our initials have been ours for over 100 years. And yet these thieves feel they have a right to literally steal our initials , without any conscience, while sending out confusing misinformation about our credentialing and schools. Their game plan is consistently to attempt to undermine our N.D. schools, which they claim are inferior diploma mills, all of which is of course untrue! Our course work of study is neither life threatening nor invasive. Unlike these paramedicals we are not trying to compete with the medical profession, which they, indeed are! They will continually strive to take on more allopathic duties like vaccines, minor surgeries, and drug prescribing, in an attempt to professionally, appear more medical. Traditional ND'S have no interest in competing with the medical professionals, or being licensed, as it is totally out of our scope of study. Our schools are using the standard curriculums from generations, before us. We are well schooled in our fields of endeavor, unlike these para-medicals who I personally feel are not only poorly trained in traditional naturopathy, but inferiorly trained in allopathy. They truly don't care who they run over to get our initials and down play our credentials. I am more than tired of continually dealing with these hucksters! I have personally been to numerous medical board meetings, where I was convinced this needs to finally be put to an end, in Pennsylvania. Because, until the medical board of PA clamps down on them, once and for all, we will all have to contend with this non stop bullying! They are not only competing with us, but they are competing with you allopaths! They are wholly unprofessional and to them the ends justifies the means. I am including a letter I wrote over 10 years ago, concerning the history of traditional naturopathy, and dealing with this continual nonsense! I have 3 years of training in Naturopathy, and 3 years of training in homeopathy. I have more than fulfilled my traditional ND requirements, plus 24 years of successful practice, in my two Northwest PA clinic locations. Here's hoping this issue is finally put to rest, once and for all, by the PA Medical Board! Since when does a new hybrid group demand and attempt to hijack the rights to initials belonging to the +100 year old , original course of study and curriculum belonging to the domain of traditional naturopathy? A real legal question for all to ponder!

Sincerely,

Gay. S. Hilton, N.D.
814.573.3169

4 HOMEOPATHIC REMEDIES FOR UTIs IN DOGS

UTIs cause your dog a lot of irritation.

But with these homeopathic remedies recommended by Dr Sara Chapman and Dr Dee Blanco, you can bring your dog some relief.

Discover the remedy that best fits your dog's symptoms.

APIS MELLIFICA

Apis mellifica is Dr Blanco's favorite starting remedy for bladder symptoms. It's good for dogs who experience:

- Burning sensations when urinating
- A frequent desire to urinate but can only pass a few drops
- Incontinence
- Sensitivity in the mid-back, over the kidney area
- Worse symptoms with heat or when covered
- Better symptoms with cool air and moving around

ACONITE

Aconite is a great remedy for frightened, shocked, or overexcited dogs. *Aconite* can help with common bladder symptoms like:

- Straining
- Burning
- Unproductive or painful urination
- Brown or brick-red urine

NUX VOMICA

Nux vomica is a good remedy for many dogs with bladder complaints. It's great for these symptoms:

- Spasms, cramping or straining to urinate
- History of exposure to toxins like flea and tick medications
- Cold natured (not cuddly, avoids your touch, tries to hide)
- Constipation or any GI issues

With these symptoms, consider intoxication as the cause.

MERCURIUS

Remember, this is a homeopathic remedy, so it isn't toxic like mercury! It helps with acute UTIs, especially when *Nux vomica* doesn't work. *Mercurius* is helpful when your dog ...

- Has blood in her urine
- Feels a frequent need to go out and urinate
- Seems to be restless
- Is panicked to get out for a pee, or seems distressed
- Has very strong-smelling urine
- Seems to be thirsty for cold water
- Has any extreme straining, either for diarrhea or urine

HOW TO GIVE YOUR DOG HOMEOPATHIC REMEDIES

Homeopathic remedies will usually come in pellet form. You'll want to look for a 30C potency.

To prepare your remedy, take 3 pellets, add them to ½ cup purified water and stir for about 30 seconds. This will leave you with several doses.

Don't refrigerate. Store the remaining mixture at room temperature on the counter, covered with a napkin.

Give about 1 ml from a dropper or syringe. All you need to do is get some liquid on your dog's gums.

If your dog has intense attacks, repeat the remedy every 15 minutes for a total of 3 doses.

After you've dosed 3 times, stop and watch for an hour or so.

If the symptoms subside, don't re-dose. Sleep is a good response, especially if followed by a lot of urine later on with no issues.

If the symptoms return, stir it up and give her another dribble.

Tip: In homeopathy, every size dog gets the same dose. It doesn't matter if you have a Great Dane or a Doxie. What matters is the potency and how often you give the remedy.



OVERVIEW OF A TRADITIONAL NATUROPATHIC APPROACH

GAY S. HILTON, N.D., RS Hom

Integrative Wellness Options
4906 Richmond Street
Erie, PA 16509
814.459.2030
drhilton@acu-nu.com
www.integrativewellnessoptions.com
www.acu-nu.com

November 5, 2013

Commonwealth of Pennsylvania
Senate Committee on Consumer Protection and Professional Licensure

Dear Ms. Cleaver:

My name is Gay S. Hilton, and I am a traditional naturopathic doctor, who is totally opposed to any legislation to create licensure for naturopathic doctors. My objective is to give you a clear picture of the vital importance of protecting the status of the traditional naturopathic doctor in the State of Pennsylvania, not to mention the prevention of unnecessary licensing, and regulating, while increasing government controls.

Traditional Naturopathic Doctors are graduates of schools, using curriculums fostered almost 112 years ago. Dr. Benedict Lust, a medical doctor, started the first naturopathic school in the United States in 1902. His vision was that there needed to be a school of medicine completely devoid of the study of chemical based medicines, or invasive procedures. In Lust's opinion, allopathic medicine focused more on treating symptoms, instead of treating cause. His graduates received degrees in natural medicine, and given the initials N.D., which stood for Doctor of Naturopathy. Dr. Lust's prerogative for the doctor of naturopathy was that the N.D. was both teacher, and natural health practitioner, integrating non allopathic medical formats. The purpose of the secular study of naturopathy was to avail a course of study which focused on unraveling the causation of illness. Pure water, sunshine, exercise, an organic diet, meditation, and the integration of both herbal and homeopathic medicines, were some of the tools, N.D.'s were taught to utilize in their healing formats. Drug therapy and surgery were to be tasks of the allopath, not the naturopathic doctor.

Allopathic studies center on utilization of chemically patented drugs, which treat a myriad of physical symptoms, surgery, and other medical procedures. This is not a part of the curriculum of a traditional naturopathic doctor. Traditional naturopathic doctors recommend natural medicines, which promote innate healing mechanisms. These innate mechanisms, known as the vital life, are operational in forcing symptoms to the surface, eventually creating a curative return to health. This is referred to as Hering's Law of Cure, which all naturopathic studies emanate from. Naturopathic protocols include body work, herbs, homeopathy, energy medicine, holistic dietary formats, cleansing and detoxification, needle less forms of acupuncture, meditation and deep breathing techniques, mind/body integration, all of which increase the healing vital life force. To this day, our traditional naturopathic doctor curriculums closely model those originally structured by Dr. Benedict Lust. Conventional medical curriculums do not typically include the study of alternative medicine. The *Dr. Oz Show*, and the scientific research of quantum physicists, have forced the allopathic community to recognize the efficacy, of what is known as quantum, energy based medicine. Both

homeopathic and Oriental Medicine formats are recognized, efficacious training programs of energy based medicine. Homeopathic medicine has been in existence for hundreds of years, while Traditional Chinese Medicine dates back over four thousand years ago.

Unfortunately, the allopathic community has a very shallow understanding of just how traditional naturopathy operates. I would ask anyone to pay a visit to my website at: www.acu-nu.com, and click on my Testimonial Page link, to discover just how efficacious traditional naturopathic medicine can be. On that note, N.D.'s periodically get a patient who has been diagnosed at the Cleveland Clinic, or other expert medical facility, as idiopathic (undefined health condition). After succinct evaluation of the human energy field, the N.D. can resolve the health issue, by identifying both the cause and specific health issue. This is perhaps one of the most important aspects of respecting the training and knowledge of a traditional naturopathic doctor's education. Conventional medicine (allopathic) has continually tried to maintain exclusivity, suggesting any other *forms of medicine*, are neither scientifically proven, nor efficacious, based on *their* allopathic training. Chiropractors, osteopaths, those trained in Oriental Medicine, naturopathic doctors, herbalists, and homeopaths must all have a minimum of 3 to 4 years of schooling, which include hours of clinical training. Internationally, homeopathy and herbal therapies are traditionally accepted forms of medicine. For over one hundred years, the Royals have utilized the services of a homeopathic doctor, who maintains a residence within the British Monarchy.

In the early 1980's the emergence of a more medically derived form of naturopathy was created, by those who wanted to combine both allopathic and naturopathic curriculums. They referred to themselves as "naturopathic physicians". They developed paramedical curriculums which included a course in pharmacology and some minor surgery. They began a ruthless, national campaign to be recognized as "the real naturopathic doctors", even snatching the initials "N.D." from the traditional naturopathic doctors. Next, they began defaming the traditional naturopathic doctor schools, referring to them as "diploma mills", which offered no substantial course in pharmacology or allopathic training.

Naturopathic physicians set out to "reform, alter, and digress" from the curriculum structured by Dr. Benedict Lust, known as traditional naturopathy. Even more unrealistic is the fact that the curriculum developed for naturopathic physicians is nowhere near the concentration of naturopathic studies, a traditional naturopathic doctor is educated in. They study a "smattering" of natural medicine, a "smattering" of allopathic medicine, and the truth be told, are not educated in enough of either modality to be considered physicians of both. As the saying goes "Jack of all trades, but master of none." Though they have many claims of a very scientific curriculum, their education actually closely resembles that of a nurse practitioner, and or, a physician's assistant. It is in no way as comprehensive or as structured as that of an allopathic curriculum.

The crux of the matter specifically centers around the claim that naturopathic physicians are more scientifically trained, and can thus offer more of a medical approach to naturopathy. The very purpose for the institution of

traditional naturopathy was to offer *a non medical alternative to health and health and healing, which naturopathic physicians simply do not adhere to!*

Naturopathic physicians also make the claim, that they can more safely prescribe, without drug/natural medicine interactions, by bridging the two modalities. The reality is that most traditional naturopathic doctors recommend proprietary blends of herbal medicines, which do not have enough of any single herb, to create an interaction with drug therapies.

Most traditional naturopathic doctors purchase herbal medicines which are professionally formulated by their supplier's research team. We do not produce and sell our own medicines, and consequently have no issues with drug interactions. If there are questions we call our respective suppliers to inquire from their herbal formulators, what scientific recommendations they would make.

To a traditionally trained naturopathic doctor, the studies of a naturopathic physician are in no way comparable to the edicts and standards set for the curriculum of traditional naturopathy. It is like comparing apples to oranges, and as you may recall, it was the explicit purpose of Dr.

Lust to keep allopathic methodology out of the study of naturopathy. They are completely separate modalities, with similar roles, but very different approaches. A naturopathic physician practices in my locality, and we have shared some patients over the years. I have been privy to some of her naturopathic recommendations, via her former patients. I was astounded by her limited understanding of classical homeopathy, as I am a certified homeopath. Many of her recommendations were skewed versions of what traditional naturopathic doctors are trained for. While I was truly enlightened by all of this, it left me wondering how any naturopathic physician can make claims of superiority in training and education. It is indeed disturbing to me, to see our tradition being, not only ruthlessly attacked, but in fact distorted, in an attempt to change what has been a very efficacious, 100 year old curriculum.

Most traditional naturopathic curriculums cover a three year courses which includes: anatomy, physiology, biological chemistry, iridology(study of the inner markings of the eye), beginner and advanced courses in herbal pharmacology, herbal therapeutics, homeopathic medicine, holistic nutrition, mind and body healing/integration, body works, energy medicine, Chinese meridian therapies, detoxification/ cleansing, and reflexology, to mention a few! A dissertation, is required at the close of the three year program, which is evaluated by a Ph.D. Many traditional naturopathic doctors go on and specialize in a specific modality of naturopathy; much like a general practitioner does in allopathic medicine. As an example, one may go on to become a certified herbalist or certified classical homeopath, each of which requires an additional three years of specialized schooling and clinical training. Note the curriculum for traditional naturopathic doctors at Eden School of Natural Health, illustrated below.

Naturopathic licensing creates a whole set of new issues. With the already skyrocketing costs of health insurances, naturopathic physicians would take advantage of coded billing for their procedures. Obviously, their procedures would be a complete duplication of services, already provided by allopaths. Surgical procedures, lab testing, and other invasive procedures should be done exclusively by medically trained professionals, whose education is more extensive, and preparation more thorough, than those of naturopathic physicians. Naturopathic doctors

already have access functional medicine labs, should testing be necessitated.

Secondly, naturopathic physicians are not traditionally trained, so their "watered down" approach to naturopathic medicine is both troubling, and many times counterproductive. A salient point must be made here for the vital importance of traditional naturopathy. Yes, you can integrate both allopathic and naturopathic modalities, but if you ask any traditionally trained naturopathic doctor if the results will be as efficacious, the answer will be a resounding *no!* Drug therapy suppresses symptoms, in contrast to naturopathic protocols which force symptoms to the surface, so they can finally be resolved. This "mixed breed" of naturopathic ideology is in complete contrast to the edicts of Hering's Law of Cure, the creed revered by all traditionally trained naturopaths.

I feel I can expertly make the claim for traditional naturopathic doctors, as I have twelve years of education in the health field. I am a graduate of Edinboro University, with a degree in health and physical education. I completed a Masters in Health, Physical Education, Recreation and Dance, specializing in exercise physiology, from the University of Pittsburgh. In order to begin a three year course of study, to become a traditional naturopathic doctor, I was required to take seven prerequisite courses. In 2013, I completed another three years of rigorous study, tallying over 550 hours of classroom, and 250 hours of clinic, to become a certified homeopathic practitioner, graduating from Allen College of Homeopathy. Since 2008, I have been director of Integrative Wellness Options, in Erie, PA. We are first and largest holistic clinic, in the tri-state area, serviced by eleven practitioners, which offer a myriad of holistic modalities.

Needless to say, I find any reference to diploma mills, or lowered expectations in curriculums for traditional naturopathic doctors, as pure nonsense! Like myself, many traditional naturopathic doctors, have nursing backgrounds, own health food stores, and are professionally trained in a variety of allied health professions. Over half the populous has visited an alternative medicine practitioner. Traditionally trained naturopathic doctors are in demand, and need to be recognized for their dedication and expertise, not degraded. Our N.D, initials were hard earned, and need to be maintained as ours, and ours alone.

The ideas of exclusivity, and that naturopathic physicians are the only ones who have the credentials to practice naturopathy are ludicrous. Naturopathic physicians, have a very limited history, when compared to traditional naturopathy, which has been around for over a century. If they want to be secularly recognized, from traditional naturopathic doctors, they should avoid the confusion they have created by "borrowing our initials"! I would respectfully recommend they be required, by state law, to be identified as either N.P's, or N.M.D, as they are in some states. At present time, only fifteen states have required licensure for naturopathic doctors.

This is primarily because traditional naturopathic doctors do not practice drug therapy or incorporate invasive procedures, which require licensure. Additionally, their programs are an alteration of the original course of study for traditional naturopathy, which they have tried to alter, digress, and marginalize. Presently, there are less than fifty naturopathic physicians practicing in Pennsylvania, while there are hundreds of traditionally trained naturopathic doctors, offering very efficacious, all natural healing modalities.

It is my hope that one sees the folly and greed associated with an attempt to license

naturopathic doctors. It would give naturopathic physicians an unfair edge in attracting patients, if our initials were stripped. Perhaps an even greater issue is the fact that there are many traditional naturopathic doctors with ten or more years of established practices, serving literally thousands of patients. I have fourteen years of an established practice, twelve years of education, and a holistic clinic. These are critical aspects which must be professionally addressed. With the large populous of traditional naturopathic doctors presently practicing in PA, as opposed to the less than fifty naturopathic physicians, considerations should be made for very critical review of any licensure. The Pennsylvania Medical Society is opposed to licensing, and traditional naturopathic doctors want nothing to do with it.

It would be akin to sanctioning the demise of a very old curriculum, lead by a group of healing artists, who choose to carry on the tradition of their forefather, Dr. Benedict Lust. Being more like a medical doctor is not the direction naturopathy should be headed in. It is an exclusive, secular science, all and of itself. The edicts of traditional naturopathy should be honored and respected, along with its foundations, associations, and organizations.

Should you have any additional questions, please contact me at 814.333.6126. I would be more than happy to meet with your committee, or senators, whom may need further clarification on the vital role of the traditional naturopathic doctor.

**Respectfully,
Gay S. Hilton, N.D., RS Hom**

Eden School of Natural Health (one of our traditional naturopathic doctor curriculums)

DOCTOR OF TRADITIONAL NATUROPATHY (ND) PROGRAM

One of the best, in-depth, traditional ND curriculums in America.

In this doctorate level curriculum, the student is properly trained in traditional naturopathy and is educated in conventional approaches in order to wisely give naturopathic consultations to those in need of it.

This curriculum meets and exceeds the World Health Organization (WHO) Standards for Naturopathy training. They have set a standard of 1500 hours of training.

Important: This doctorate curriculum does not prepare or authorize graduates to diagnose or treat disease but to educate and counsel individuals or groups in natural health.

Doctor is defined as " teacher"

Doctors of Traditional Naturopathy are teachers.

Requirement: High school diploma or GED

Note: Normally it would require an Associates degree in the health sciences but New Eden School has included all the courses necessary to fulfill the requirements for this degree.

Duration: Generally takes up to 48 months to complete by distance learning, which all major colleges and universities are now offering, also referred to as e-learning.

OUTLINE OF COURSES:

Anatomy and Physiology

Natural Health and Nutrition

Pathology I

Pathology II

Pharmacology

Herbology

Herbal First Aid

Chemistry and Nutrition

Enzyme Nutrition

Nutritional Herbology

Hydrotherapy

Reflexology

Kinesiology

Energy Medicine

Practical Iridology

Natural Health Approaches I

Natural Health Approaches II

Natural Health Approaches III

Orthomolecular Nutrition

DSM-IV

Aromatherapy

Clinical Botanical Medicine

Homeopathy

Natural Health Assessments

Natural Health Approaches IV

Natural Health Approaches V

Twelve Credit Hours from the Following Electives:

Bach Flower Remedies

Biological Theory of Ionization as Applied to Human Nutrition

Nutrition for Children

Clinical Nutrition

Clinical Botanical Medicine II

Fitness & Weight Management

Starting Your Business as a Natural Health Practitioner

Doctoral Dissertation

Note: Under school discretion, some courses can be replaced with others

Total Credit Hours: 121 (Equals to 1936 classroom hours)

Tuition: 4235.00

Study guide, test material and instructor included (textbooks not included)

35.00 per credit hour if enrolled in ND program

Field Observation or internship is not required for graduation but highly recommended. 400 hours are recommended, this meets the WHO standards. See the Resource Center for a list of practitioner directories for possible internship.

Note: There are options to the doctoral dissertation, click on it.

Award: Doctor of Traditional Naturopathy (ND)

The ND designation stands for Naturopathic Doctor

Graduates can also use the following designation:

Doctor of Natural Medicine (D.N.M)

Certification Boards:

The American Council for Holistic Medicine at

<http://www.theachm.org/>

American Naturopathic Medical Certification Board (ANMCB)

www.anmcb.org

License: Available through PMA, www.pmai.us

Graduates are encouraged to become members of any of the following:

American Naturopathic Medical Association (ANMA)

<http://www.anma.org/>

American Naturopaths Association (ANA)

<http://www.americannaturopathsassociation.org/>

International Association of Natural Health Practitioners (IANHP)

www.ianhp.org

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Jaie Bosse <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 9:56 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.

Including "lay practitioners" is extremely confusing to everyone!

The proposed rules have included reference to "lay practitioners" in §18.907. I 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,

Jaie Bosse
228 S 45th St

Philadelphia, PA 19104-2919

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Jennifer Hampton <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 8:56 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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

Sincerely,

Jennifer Hampton
102 Fulton Drive Venetia PA
Venetia, PA 15367-1013

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Madeline Miller <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 6:08 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Sincerely,

Madeline Miller
111 N Park Rd
Newtown, PA 18940-1183

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Patrice Moccio Turner <mailagent@thesoftedge.com>
Sent: Monday, June 26, 2023 5:32 PM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Sincerely,

Patrice Moccio Turner
4 Lindsie Court
Lititz, PA 17543-8120

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of pchampion114@juno.com
Sent: Monday, June 26, 2023 9:02 PM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Sincerely,

Patricia Champion
9904 Grandview Ave
Pittsburgh, PA 15235-1632

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Penny Barnes <mailagent@thesoftedge.com>
Sent: Wednesday, June 28, 2023 3:04 PM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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

Sincerely,

Penny Barnes
247 Cumberland Rd.
Camp Hill, PA 17011-6678

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Quentin Hampton <mailagent@thesoftedge.com>
Sent: Wednesday, June 28, 2023 9:54 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. I want the ability to reference my mental health clients to naturopathic doctors with reputable, educational credentials. This will prevent harm to my clients that may come from sending them to self-proclaimed "doctors" and "lay naturopaths" who lack doctorate-level education and board certification.

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Sincerely,

Quentin Hampton
102 FULTON DR
Venetia, PA 15367-1013

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Richard Miller <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 6:10 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Sincerely,

Richard Miller
111 N Park Rd
Newtown, PA 18940-1183

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Sandy Funk <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 11:38 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Sincerely,

Sandy Funk
1410 Montrose Ave
Bethlehem, PA 18018-2615

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Sarah Rodgers <mailagent@thesoftedge.com>
Sent: Tuesday, June 27, 2023 8:14 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Sincerely,

Sarah Rodgers
509 Benyou lane
New Cumberland, PA 17070-3004

Worthington, Amber

From: mailagent@thesoftedge.com on behalf of Stephanie Reider <mailagent@thesoftedge.com>
Sent: Monday, June 26, 2023 10:26 PM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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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,

Stephanie Reider
120 Sholly Drive
Mechanicsburg, PA 17055-5841

From: [Stephanie Reider](#)
To: [ST, RegulatoryCounsel](#)
Subject: [External] Naturopathic Doctors - Contributing testimony for upcoming meeting
Date: Monday, June 26, 2023 2:47:05 PM

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Dear Regulatory Counsel, I am writing to share my experience with traditional medicine and what led me to my naturopathic doctor. I have dealt with thyroid issues for 20+ years, during most of that period I have been managed by several endocrinologists from several different hospital systems including Hershey, Pinnacle Health, UPMC, and Johns Hopkins. Over that 20 year span my thyroid numbers have fluctuated greatly and not one of the doctors was able to help me figure out why nor did they really have much concern as to why. The doctors always seem to be on a tight schedule. Many were expected to see a patient every 10 minutes due to the corporate environment of medicine. Therefore, they would write a new dose of synthroid and send me out the door. I also had a two year period where I dealt with gut issues and dealt with what felt like repeat yeast infections. I visited my doctor several times and was always just given a script and sent out the door. I was tired of how I felt and started researching things on my own and discovered a book that described candida overgrowth. So on my own I started to follow what's called the candida diet and work toward healing my gut with the diet and supplements. These two scenarios and the fact that the corporate model of medicine was not working for me led me to find my naturopathic doctor. I felt as though it was time to try something different and see if I could get some answers. With my naturopathic doctor I finally feel like I have someone coming alongside me to figure out why my thyroid levels fluctuate. She and I are looking at the big picture of how all my hormones work together and where the breakdown in the chain is occurring. She has recommended some different supplements to help with the candida overgrowth and my gut is feeling healthy and restored. I am feeling physically better than I have in many years. It would be extremely beneficial in my personal situation if my naturopath could prescribe traditional medications since she is helping me to regulate my thyroid. As it stands now I have to have an additional appointment and out of pocket cost to see another doctor just to have a dose change of synthroid. I would love to eliminate this extra step from my current care.

It was a long battle for prescribing rights for both physician assistants and nurse practitioners and I think we could all agree that if it weren't for these providers our medical system would be in a much darker place than it already is with the current lack of doctors. Their skills have become a necessity in our current world of medicine. I would ask that you give that same consideration to naturopathic doctors to allow them to use their training and expertise to prescribe a traditional medication when they deem it necessary for their patients. I believe the skills of a naturopathic doctor are also a necessity in our current world of medicine. Please vote to make this a reality and give prescribing rights to naturopathic doctors in Pennsylvania.