

**Worthington, Amber**

From: Marie Winters <marie.winters@gmail.com>
Sent: Monday, July 3, 2023 1:36 PM
To: ST, RegulatoryCounsel
Subject: [External] Re: 16A-4953 Naturopathic Doctors Draft Annex and ANFR - State Board of Medicine
Attachments: MWinters - ND Regs_DraftAnnexResponse.pdf

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Dear Ms. Walter,

Please see my attached response to the latest draft annex of the regulation on naturopathic doctors.

Thank you so much for your work on this matter.

Best,

Marie Winters ND, FABNO

On Tue, Jun 6, 2023 at 2:10 PM ST, RegulatoryCounsel <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

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Marie Winters ND, FABNO (she/her)

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Shana M. Walter, Counsel
State Board of Medicine
2601 North 3rd Street
Harrisburg, PA 17110

Re: 16A-4953 – Naturopathic Doctors Draft Annex

Juy 3rd, 2023

As a naturopathic doctor in practice in Pennsylvania for the past sixteen years, I am beyond excited to see the regulations for naturopathic doctors move forward. I've been active in Pennsylvania's naturopathic state association, the PANP, since I moved to Pennsylvania, hoping to regulate the practice of naturopathic medicine in this state. Through my work with the PANP, my goals have been two-fold:

- To help standardize the training and practice of those who might call themselves naturopathic doctors so the public and other allied healthcare professionals can identify qualified practitioners.
- To integrate naturopathic medicine into the healthcare community in Pennsylvania so we can collaborate with other providers and better contribute to the care of the residents of this state.

The updated draft annex for naturopathic doctors is a worthy step in this direction. Based on my reading, and with respect to the plain language of HB 516, and the comments from IRRRC, I respectfully make the following recommendations:

- 1) Keep the word "practice" with regard to the practice of naturopathic medicine in the various spots where it was struck in this version of the annex. HB516 plainly states that those who are registered as naturopathic doctors will be entitled to practice naturopathic medicine. This word was struck in the following places:
 - a) 18.13a(e)

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- b) 18.15a(d)
 - c) 18.911(c)(8)
- 2) Update 18.905(b)(6) so that 3 hours of child abuse training is consistently required throughout the annex.
- 3) Require those naturopathic doctors who have not had clinical contact with a patient for four or more years, or as a disciplinary action, to pass Part II of the NPLEX exam. Part I of the NPLEX is the basic science portion of the exam, whereas Part II is the clinical science portion of the exam. This would impact the following sections of the annex:
- a) 18.905(b)
 - b) 18.913(b)(5)
- 4) Strike 18.907(b) from the annex. HB516 was passed in order to distinguish naturopathic doctors from other varied lay practitioners in the state. This section of the annex goes beyond the bounds of the legislation that was passed, and furthermore recognizes a disparate group of individuals with varied levels of training and skill, some of whom we believe pose a danger to the health and wellbeing of Pennsylvania residents. Lay practitioners of natural medicine can call themselves whatever they would like, as long as it is not one of the protected titles in this annex.
- 5) Clarification about section 18.910(a). Many naturopathic doctors in Pennsylvania work in group practices. Would this section require these group practices to list the names of each naturopathic doctor who works in the practice in each advertisement? If a hospital, like UPMC, advertises that they have naturopathic doctors on staff, do they have to list the names of all the naturopathic doctors they employ? Is this the standard for other healthcare professionals in Pennsylvania?
- 6) Finally, define "naturopathic evaluation" as recommended by the IRRC. A naturopathic medicine evaluation determines how our patients should be managed, which services we will provide, and allows us to assess our patients' progress or lack thereof. It is an essential part of naturopathic medicine not currently defined in this annex.



Again, thank you wholeheartedly for moving this annex forward. I excitedly anticipate the day I can officially say I'm a naturopathic doctor registered in my home state of Pennsylvania.

In Health,

A handwritten signature in black ink that reads "Marie Winters". The signature is written in a fluid, cursive style.

Marie Winters ND, FABNO