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**To:** ST\_RegulatoryCounsel  
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**Subject:** [External] reg # (16A-4958) Licensure by Endorsement  
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Independent Regulatory  
Review Commission

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Dear Department of State, Bureau of Professional Affairs and the PA State Board of Medicine,

The Pennsylvania Association of Naturopathic Physicians supports the inclusion of naturopathic doctors in regulation 16A-4958, Licensure by Endorsement.

Most naturopathic doctors currently working in Pennsylvania do maintain a license to practice naturopathic medicine from an outside state that regulates naturopathic medicine.

In the proposed regulation for licensure by endorsement, the two year requirement for practice out of state would exclude most providers already in the state who maintain licenses in other states, including Pennsylvania-based Naturopathic Doctors.

As such we support the enactment of the Naturopathic Doctors Registration Act, so that Pennsylvania-based ND's can join out of state providers in taking advantage of this regulation.

Thank you,

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