

# AMA Scope of Practice Data Series

## Naturopaths

### 2018

Disclaimer: This module is intended for informational purposes only, may not be used in credentialing decisions of individual practitioners, and does not constitute a limitation or expansion of the lawful scope of practice applicable to practitioners in any state. The only content that the AMA endorses within this module is its policies. All information gathered from outside sources does not reflect the official policy of the AMA.

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## Overview of the Scope of Practice Data Series

The American Medical Association believes that all qualified health care professionals play an integral role in the delivery of health care in this country. Efficient delivery of care, by all accounts, requires a team-based approach, which cannot exist without inter-professional collaboration between physicians, nurses and other health care professionals. When each member of the health care team plays his or her optimal and unique role – a role that should be clearly defined by one’s education and training – the AMA believes patients reap the benefits.

The AMA recognizes that patients’ access to care is a legitimate concern in the United States. However, actual or perceived workforce shortages in the medical profession cannot and should not be solved by exposing patients to health care providers whose education or training does not support the caregiving role they seek. Scope of practice expansions that are misaligned with practitioners’ education and training are unlikely to be in the best interests of patients.

Each year in nearly every state, and sometimes at the federal level, non-physicians practitioners lobby state legislatures, their own state regulatory boards and federal regulators for expansions of their scopes of practice. While some scope expansions may be appropriate, others definitely are beyond their education and training. Often these lobbying efforts are “supported” with incomplete, inaccurate and misleading information that potentially confuses legislators and regulators. Non-physician groups often assert, wrongfully, that their education and training is commensurate with physicians’ education and training.

It is important, therefore, to explain to legislators and regulators the actual parameters of non-physicians’ education and training, licensure requirements and other areas necessary for an objective understanding of how non-physicians’ scope of practice compares and contrasts with the medical profession.

For these reasons the AMA has created the Scope of Practice Data Series modules. These modules provide critical information about and the limitations of non-physician education and training. These modules are intended to provide policymakers with the objective information they need to make sound legislative and regulatory decisions on scope of practice issues.

The AMA’s Advocacy Resource Center (ARC) has created this information module on naturopaths to serve as a resource for state medical associations, national medical specialty societies and policymakers.<sup>1,2</sup>

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<sup>2</sup> The AMA Scope of Practice Data Series module distribution policy is as follows: The modules are advocacy tools used to educate legislators, regulatory bodies and other governmental decision makers on the education and training of physician and non-physician health care providers. As such, the AMA will distribute the modules to the following parties: (1) state medical associations; (2) state medical boards; (3) national medical specialty societies; and (4) national medical organizations. In line with the express purpose of advocacy directed to government, it is the policy of the AMA not to provide the modules to individual physicians. Organizations supplied with the modules must follow the AMA distribution policy.

## Family physicians

Family physicians are physicians who “diagnose, treat, and help prevent diseases and injuries that commonly occur in the general population.”<sup>3</sup> It is a specialty in breadth that integrates the biological, clinical and behavioral sciences. The scope of family medicine encompasses all ages, both sexes, each organ system and every disease entity.<sup>4</sup>

A family physician’s education and training begins with four years of medical school, followed by three years of residency training. Some family physicians also pursue fellowship training to study and become certified in such subspecialties as Adolescent Medicine, Faculty Development, Geriatrics, Hospice and Palliative Medicine, Obstetrics, Preventive Medicine, Research, Rural Medicine, Sports Medicine and Substance Abuse. After establishing licensed practice, family practice physicians may demonstrate mastery of knowledge in family medicine by obtaining board certification from the American Board of Family Medicine, a member of the American Board of Medical Specialties or American Osteopathic Board of Family Physicians which is governed by the American Osteopathic Association Board of Osteopathic Specialists.<sup>5</sup>

**Patient health and safety is threatened when limited licensure providers are permitted to perform services that are not commensurate with their education or training.**

## Medical school

The four-year medical school curriculum focuses on fundamental principles of medicine and its underlying scientific concepts. It includes required courses on anatomy, biochemistry, genetics, physiology, microbiology and immunology, pathology, pharmacology and therapeutics, and preventive medicine, including laboratory. The total number of hours of basic sciences course work based on the average across reporting medical schools is 1,352.<sup>6</sup>

Clinical sciences studies encompass all organ systems, including the important aspects of preventive, acute, chronic, continuing, rehabilitative, and end-of-life care. Clinical experience includes family and internal medicine, obstetrics, gynecology, pediatrics, psychiatry, and surgery as well as clinical electives. This wide-ranging curriculum prepares medical students to enter any field of graduate medical education upon graduation from medical school.

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<sup>3</sup> Bureau of Labor Statistics. Family and General Practitioners. [www.bls.gov/oes/current/oes291062.htm](http://www.bls.gov/oes/current/oes291062.htm). Accessed May 17, 2012.

<sup>4</sup> American Board of Family Medicine (ABFM). Public/Patients What is Family Medicine? [www.theabfm.org/public/index.aspx](http://www.theabfm.org/public/index.aspx). Accessed May 17, 2012.

<sup>5</sup> American Osteopathic Board of Family Physicians. [www.aobfp.org](http://www.aobfp.org). Accessed May 17, 2017.

<sup>6</sup> American Academy of Ophthalmology (AAO). Policy Statement Differences in Education between Ophthalmologists and Optometrists. [www.aao.org/about/policy/upload/2011-Differences-in-Education.pdf](http://www.aao.org/about/policy/upload/2011-Differences-in-Education.pdf). Accessed Dec. 15, 2014.

During medical school, students receive a comprehensive education in the classroom and in laboratories, where they study the biological, chemical, pharmacological and behavioral aspects of the human condition. This period of intense study is supplemented by two years of patient care rotations through different specialties, during which medical students assist licensed physicians in the care of patients. During clinical rotations, medical students continue to develop their clinical judgment and medical decision-making skills through direct experience managing patients in all aspects of medicine.

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## Licensure examination series

During and following graduation from medical school, medical students must pass a series of exams—the United States Medical Licensing Exam (USMLE) for MD candidates and the Comprehensive Osteopathic Medical Licensure Examination of the United States (COMLEX-USA) for DO candidates—to help provide public assurance that medical school curriculum prepares medical students for the independent practice of medicine.

### United State Medical Licensing Exam (USMLE)

The USMLE assesses a physician's ability to apply knowledge, concepts, and principles, and to demonstrate fundamental patient-centered skills, that are important in health and disease and that constitute the basis of safe and effective patient care.<sup>7</sup> In short, the exam assesses a physician's readiness for licensure.

In the United States, the individual medical licensing authorities ("state medical boards") of the various jurisdictions grant a license to practice medicine.<sup>8</sup> Each medical licensing authority sets its own rules and regulations and requires passing an examination that demonstrates qualification for licensure.<sup>9</sup> The USMLE thus provides state medical licensing authorities with a common evaluation system for applicants for medical licensure.<sup>10</sup>

The three-step exam provides "a common evaluation system for applicants for initial medical licensure."<sup>11</sup> Sponsored by the Federation of State Medical Boards and the National Board of Medical Examiners, the USMLE consists of<sup>12</sup>:

- Step 1: Assessment of whether the medical school student or graduate understands and can apply important concepts of the sciences basic to the practice of medicine.

<sup>7</sup> USMLE. Overview Purpose. [www.usmle.org/bulletin/overview/#TestFormat](http://www.usmle.org/bulletin/overview/#TestFormat). Accessed Dec. 15, 2014.

<sup>8</sup> USMLE. About the USMLE. [www.usmle.org/about/](http://www.usmle.org/about/). Accessed Dec. 15, 2014.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> *Supra* note 6.

- Step 2: Assessment of whether the medical school student or graduate can apply medical knowledge, skills and understanding of clinical science essential for provision of patient care under supervision.
- Step 3: Assessment of whether the medical school graduate can apply medical knowledge and understanding of biomedical and clinical science essential for the unsupervised practice of medicine.

## Comprehensive Osteopathic Medical Licensure Examination of the United States (COMLEX-USA)

The National Board of Osteopathic Medical Examiners (NBOME) COMLEX-USA is a series of sequential examinations that osteopathic medical students and residents must pass to be licensed to practice osteopathic medicine. The primary pathway to licensure for osteopathic physicians, COMLEX-USA is universally accepted for osteopathic physician licensure in the United States and by physician licensing authorities in numerous international jurisdictions.<sup>13</sup>

COMLEX-USA assesses the osteopathic medical knowledge and clinical skills considered essential for osteopathic generalist physicians to practice medicine without supervision. The progressive nature of the COMLEX-USA examinations ensures the consistency and continuity of the measurement objectives of the osteopathic medical licensing examinations.<sup>14</sup> All four COMLEX-USA series examinations must be passed to achieve medical licensure and osteopathic medical students must pass Levels 1 and 2 to graduate from osteopathic medical school.<sup>15</sup>

- LEVEL 1: Assesses the application of foundational and basic biomedical and osteopathic science knowledge relevant to clinical presentations, emphasizing the scientific concepts and principles necessary for understanding the mechanisms of health, clinical problems and disease processes.
- LEVEL 2-CE: Assesses the application of knowledge of clinical concepts and principles involved in all steps of clinical problem solving for osteopathic medical practice, emphasizing the biomedical and osteopathic concepts and principles necessary for making appropriate clinical diagnoses through patient history and physical examination findings.
- LEVEL 2-PE: Assesses fundamental patient-centered clinical skills. These skills are evaluated in the context of clinical encounters and are required to be personally performed as appropriate in a timely, efficient, safe, and effective manner. The clinical skills tested include: physician-patient communication, interpersonal skills and professionalism, medical history-taking and physical examination skills, osteopathic principles and osteopathic manipulative treatment, and documentation skills (including synthesis of clinical findings, integrated differential diagnosis, and formulation of a diagnostic and treatment plan).

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<sup>13</sup> COMLEX-USA Bulletin of Information. [www.nbome.org/comlexusaboi/intro](http://www.nbome.org/comlexusaboi/intro). Accessed March 21, 2017. *See also* About NBOME. [www.nbome.org/about.asp](http://www.nbome.org/about.asp). Accessed March 21, 2017.

<sup>14</sup> COMLEX-USA Bulletin of Information. <http://www.nbome.org/comlex-cbt.asp>. Accessed March 21, 2017.

<sup>15</sup> *Id.* *See also* COMLEX-USA Level 2-PE Orientation Guide. <http://www.nbome.org/docs/PEOrientationGuide.pdf>. Accessed March 21, 2017. *See also* Commission on Osteopathic College Accreditation. [www.osteopathic.org/inside-aoa/accreditation/COM-accreditation/Documents/com-accreditation-standards-7-1-16.pdf](http://www.osteopathic.org/inside-aoa/accreditation/COM-accreditation/Documents/com-accreditation-standards-7-1-16.pdf). Accessed March 21, 2017.

LEVEL 3: Assesses the application of knowledge of clinical concepts and principles involved in all steps of clinical problem solving for osteopathic medical practice, emphasizing the biomedical and osteopathic concepts and principles required to make appropriate patient management decisions as independently practicing osteopathic generalist physicians.

## Residency

Newly graduated physicians enhance their medical training in residency education, a three- to seven-year period during which they provide care in a select surgical or medical specialty under the supervision of experienced physician faculty in a field such as ophthalmology. Residency programs in the U.S. are evaluated and accredited by the Accreditation Council for Graduate Medical Education (ACGME) or the American Osteopathic Association (AOA).

Residency education provides the additional education and training necessary to assure the competence of an independently practicing physician. Residency “is physically, emotionally, and intellectually demanding, and requires longitudinally-concentrated effort on the part of the resident.”<sup>16</sup>

During residency, the essential learning activity is interaction with patients under the guidance and supervision of faculty members who give value, context, and meaning to those interactions. In the first year of residency, physicians are supervised either directly or indirectly with direct supervision immediately available. As residents gain experience and demonstrate growth in their ability to care for patients, they assume roles that permit them to exercise those skills with greater independence.

This concept—graded and progressive responsibility—is one of the core tenets of American graduate medical education.<sup>17</sup> Residency programs provide appropriate supervision for all residents that is consistent with proper patient care and the residents’ educational needs, which allows residents to assume progressively increased responsibility according to their level of education, ability, and experience.<sup>18</sup> In short, residency prepares physicians for the independent practice of medicine in a specialty or subspecialty.

The concept of graded and progressive responsibility is one of the core tenets of American graduate medical education.

## Family medicine residency

Following medical school, physicians must complete a 3-year family medicine residency program to become family physician.<sup>19</sup> Residency in family medicine includes three additional years of education and training,

<sup>16</sup> ACGME Program Requirements for Graduate Medical Education in Ophthalmology. [www.acgme.org/Portals/0/PFAssets/ProgramRequirements/240\\_ophthalmology\\_2016.pdf](http://www.acgme.org/Portals/0/PFAssets/ProgramRequirements/240_ophthalmology_2016.pdf). Accessed March 23, 2017.

<sup>17</sup> *Id.*

<sup>18</sup> ACGME Institutional Requirements. Effective July 1, 2015. [www.acgme.org/acgme/Portals/0/PDFs/FAQ/InstitutionalRequirements\\_07012015.pdf](http://www.acgme.org/acgme/Portals/0/PDFs/FAQ/InstitutionalRequirements_07012015.pdf). Accessed July 8, 2015.

<sup>19</sup> ACGME Program Requirements for Graduate Medical Education in Family Medicine. [www.acgme.org/Portals/0/PFAssets/ProgramRequirements/120\\_family\\_medicine\\_2016.pdf](http://www.acgme.org/Portals/0/PFAssets/ProgramRequirements/120_family_medicine_2016.pdf). Accessed July 8, 2015.



focused on knowledge of established and evolving biomedical, clinical, epidemiological and social behavioral sciences, as well as the application of this knowledge to patient care.<sup>20</sup>

As part of their residency, family medicine residents participate in integrated inpatient and outpatient learning and receive training in six major medical areas: pediatrics, obstetrics and gynecology, internal medicine, psychiatry and neurology, surgery, and community medicine. They also receive instruction in many other areas including geriatrics, emergency medicine, ophthalmology, radiology, orthopedics, otolaryngology, and urology.<sup>21</sup> ACGME program requirements for family medicine residencies provide detail on the number of patient encounters required for each specialty and patient population. For example, residents must provide care for a minimum of 200 hours (or two months) or 250 patient encounters dedicated to the care of acutely ill or injured adults in an emergency department setting.<sup>22</sup>

Residents should participate in and assume progressive leadership of appropriate care teams to coordinate and optimize care for a panel of continuity patients.<sup>23</sup> By the end of a family medicine residency, a physician must demonstrate the competence to independently provide patient care in a broad range of areas of medicine.<sup>24</sup> Because of the extensive range of knowledge acquired during residency, family medicine physicians are prepared to independently treat a range of acute, chronic, and preventive medical services.

Because of the extensive range of knowledge acquired during residency, family medicine physicians are prepared to deliver a range of acute, chronic, and preventive medical services.

## Board Certification

After completing an accredited residency and establishing licensed practice, family medicine physicians may demonstrate mastery of knowledge in Family Medicine by obtaining board certification from the American Board of Family Medicine (ABFM), a member of the American Board of Medical Specialties (ABMS), or the American Osteopathic Board of Family Physicians (AOBFP), which is governed by the AOA Bureau of Osteopathic Specialists.<sup>25</sup> Board certification goes beyond the minimum requirements necessary for licensure and provides the public assurance that a physician has the appropriate knowledge, skills, and experience to deliver optimum care in a specific area of medicine.<sup>26</sup>

<sup>20</sup> *Id.*

<sup>21</sup> American Association of Family Physicians (AAFP). Family Medicine Specialty. [www.aafp.org/about/the-aafp/family-medicine-specialty.html](http://www.aafp.org/about/the-aafp/family-medicine-specialty.html). Accessed Aug. 24, 2015. *See also* American Osteopathic Board of Family Physicians (AOBFP). [www.aobfp.org](http://www.aobfp.org). Accessed Aug. 24, 2015.

<sup>22</sup> *Supra* note 19. See Section IV.A.6.

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* See Section IV.A.5.a.

<sup>25</sup> ABFM. Public/Patients. [www.theabfm.org/public/index.aspx](http://www.theabfm.org/public/index.aspx). Accessed Dec. 15, 2014.

<sup>26</sup> *Id.*



## American Board of Family Medicine (ABFM) certification

To obtain ABFM certification in family medicine, board-eligible physicians who entered family medicine residency training after June 1, 2012 must complete the Resident Certification Process.<sup>27</sup> In addition to completing an accredited residency and obtaining a license to practice, the ABFM Resident Certification Process requires the following:

- Completion of 50 Family Medicine Certification points including:
  - One Knowledge Self-Assessment (KSA<sup>28</sup>) (10 points each),
  - One Performance Improvement (PI) activity<sup>29</sup> with data from a patient population (20 points each); and
  - Additional approved activities to reach a minimum of 50 points; and
- Successful completion of the Family Medicine Certification Examination<sup>30</sup>, a full day computer-based examination consisting of four equal sections. Each sections contains 80 Multiple-Choice Questions. The second section contains 40 Multiple-Choice Questions over a selected modular exam topic.<sup>31</sup> Certification is valid for either a 7- or a 10-year period, depending on the date of certification and recertification, after which the diplomate must apply for recertification.<sup>32</sup>

### ABFM Family Medicine Certification

ABFM diplomates can maintain certification following one of two tracks, depending on the year in which the diplomate certified or recertified.

- Diplomates who certified or recertified in 2003-2010 must maintain certification within a 7-year or a 10-year cycle.
  - 10-year option<sup>33</sup> – Broken down into three 3-year stages, with each stage requiring at least 1 Knowledge Self-Assessment (KSA) Activity; at least one Performance Improvement (PI)

<sup>27</sup> ABFM. Family Medicine Certification Examination. [www.theabfm.org/cert/](http://www.theabfm.org/cert/). Accessed Nov. 21, 2017.

<sup>28</sup> *Id.* KSA topics are: Asthma, Care of the Vulnerable Elderly, Cerebrovascular Disease, Childhood Illness, Coronary Artery Disease, Depression, Diabetes, Health Behavior, Heart Failure, Hospital Medicine, Hypertension, Maternity Care, Mental Health in the Community, Pain Management, Preventive Care, and Well Child Care.

<sup>29</sup> *Id.* Examples of PI activities offered by the ABFM include: Asthma, Comprehensive, Coronary Disease, Depression, Diabetes, Hand Hygiene, Heart Failure, and Hypertension.

<sup>30</sup> *Id.* All exams administered by the ABFM are referred to as the Family Medicine Certification Examination, regardless of whether a physician is certifying for the first time or recertifying.

<sup>31</sup> The physician selects one module from eight possible choices on specific topics within family medicine: Ambulatory Family Medicine, Child and Adolescent Care, Geriatrics, Women's Health, Maternity Care, Emergent/Urgent Care, Hospital Medicine, or Sports Medicine. ABFM. ABFM Family Medicine Certification Examination Content. [www.theabfm.org/moc/examcontents.aspx](http://www.theabfm.org/moc/examcontents.aspx). Accessed Nov. 21, 2017.

<sup>32</sup> *Supra* note 27.

<sup>33</sup> ABFM. Requirements for Diplomates who Certified or Recertified in 2003–2010. [www.theabfm.org/moc/requirements20032010.aspx](http://www.theabfm.org/moc/requirements20032010.aspx). ABFM. Accessed Nov. 21, 2017. As long as a diplomate continues to meet these requirements in each 3-year stage, the diplomate will be on track for the 10-year option. If at any time a stage requirement is not completed on time, the diplomate will revert to the 7-year certificate.

Activity (PPM or approved alternative); and at least 50 Family Medicine Certification Points. The diplomate must also complete 300 CME credits in the six years leading up to the examination. The Family Medicine Certification Examination is taken in year 10.

- 7-year option<sup>34</sup> – Requires at least three Knowledge Self-Assessment (KSA) Activities; at least one Performance Improvement Activity (PPM or approved alternative); and at least 110 Family Medicine Certification Points. The Family Medicine Certification Examination is taken in year seven.
- Diplomates who certified or recertified in 2011 and beyond must complete the following to maintain certification within each 10-year cycle, met in three-year stages that each must include one KSA Activity; one Performance Improvement Activity, and at least 50 Family Medicine Certification Points from the completion of KSA or PI Activities.<sup>35</sup> In addition, each physician must complete 150 CME credits every 3-year stage. The MC-FP Exam is taken in year 10.

## American Osteopathic Board of Family Physicians (AOBFP) certification

Graduates of accredited by the Commission on Osteopathic College Accreditation, who have completed, within the past six years, a three-year AOA-approved family medicine residency or currently in a three-year AOA- or ACGME-approved family medicine program.<sup>36</sup> AOBFP board certification requires an active license to practice medicine, continuous membership in good standing in the AOA or Canadian Osteopathic Association during the immediately preceding two years prior to application for certification, documentation per AOA Activity Reports of 150 applicable CME credits for the previous three years, and a certification exam (Cognitive Examination).<sup>37</sup>

### AOBFP Osteopathic Continuous Certification

Osteopathic Continuous Certification (OCC) is the process through which AOBFP diplomates can maintain their certificate in family medicine. The AOBFP OOC program has a five-component framework.<sup>38</sup>

- Active Licensure – Requires that physicians who are board-certified by the AOA hold a valid, active license to practice medicine and adhere to the AOA's Code of Ethics.
- Lifelong Learning/Continuing Medical Education – Requires that all recertifying physicians fulfill a minimum of 150 hours of CME credit during each three-year CME cycle. Of these 150 CME credit hours, a minimum of 50 credit hours must be in the specialty area of certification. Self-assessment activities will be designated by each of the specialty certifying boards.

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<sup>34</sup> *Id.*

<sup>35</sup> ABFM. Requirements for Diplomates who Certified or Recertified Since 2011.

[www.theabfm.org/moc/requirementsbeyond.aspx](http://www.theabfm.org/moc/requirementsbeyond.aspx). Accessed Nov. 21, 2017.

<sup>36</sup> AOBFP Board Eligibility Criteria. [www.aobfp.org/certification-examinations/board-eligibility/](http://www.aobfp.org/certification-examinations/board-eligibility/). Accessed May 17, 2017.

<sup>37</sup> ABOFP. Board Eligibility. [www.aobfp.org/certification-examinations/board-eligibility](http://www.aobfp.org/certification-examinations/board-eligibility) Accessed Aug. 24, 2015.

<sup>38</sup> American Osteopathic Association. Osteopathic Continuous Certification. [www.osteopathic.org/inside-aoa/development/aoa-board-certification/Pages/osteopathic-continuous-certification.aspx](http://www.osteopathic.org/inside-aoa/development/aoa-board-certification/Pages/osteopathic-continuous-certification.aspx). Accessed Aug. 24, 2015.

- Cognitive Assessment – Requires successful completion a psychometrically valid and proctored examinations that assess a physician’s specialty medical knowledge, as well as core competencies in the provision of health care.
- Practice Performance Assessment and Improvement – Requires that the physician engage in continuous quality improvement through comparison of personal practice performance measured against national standards for the physician’s medical specialty.
- Continuous AOA Membership.

# Naturopaths

Three types of practitioners offer naturopathic treatment<sup>39</sup>:

- Naturopathic “doctors” (N.D. or N.M.D.) – Have graduated from a four-year graduate school of naturopathy, and are educated in both the basic sciences and complementary and alternative treatment modalities.
- Traditional naturopaths – Have obtained education through some combination of a mentorship program with another practitioner or an alternative clinic, distance learning program, and/or classroom schooling on natural health or otherwise holistic studies.
- Chiropractors, massage therapists, dentists, nurses, nutritionists, or doctors who practice under a professional license but include some naturopathic methods in their practice, who may have studied or read on their own or taken courses on naturopathic methods.

This module will focus primarily on the education, training and qualifications of N.D. or N.M.D. naturopaths, practitioners who attend four-year graduate schools of naturopathy and earn advanced degrees, as opposed to traditional naturopaths, who receive either apprentice-style training or attend unaccredited naturopathy schools.

## Naturopathy

Naturopathy is “[a] system of therapeutics in which neither surgical nor medical agents are used, dependence being placed on only natural (nonmedical) forces.”<sup>40</sup> Currently, naturopaths are licensed in eighteen states,<sup>41</sup> the District of Columbia, and the United States territories of Puerto Rico and the United States Virgin Islands. Naturopathic licensure generally requires four years of education and passage of a standardized exam, as well as continuing education to maintain licensure.<sup>42</sup> Naturopathic scope of practice varies by state.

A naturopath is educated on the basic sciences and complementary and alternative treatment modalities. Naturopaths focus “on holistic and non-toxic approaches to therapy with a strong emphasis on disease prevention and optimizing wellness.”<sup>43</sup> Naturopathy “combines many methodologies, such as acupuncture, massage, chiropractic adjustment, homeopathy and herbal cures, along with sensible concepts such as good nutrition, exercise and relaxation techniques.”<sup>44</sup>

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<sup>39</sup> American Cancer Society. Naturopathic Medicine.

[www.cancer.org/Treatment/TreatmentsandSideEffects/ComplementaryandAlternativeMedicine/MindBodyandSpirit/naturopathic-medicine](http://www.cancer.org/Treatment/TreatmentsandSideEffects/ComplementaryandAlternativeMedicine/MindBodyandSpirit/naturopathic-medicine). Accessed Feb. 6, 2015.

<sup>40</sup> Stedman’s Medical Dictionary, 25<sup>th</sup> Ed. (Williams & Wilkins, Baltimore 1990).

<sup>41</sup> Alaska, Arizona, California, Colorado, Connecticut, Hawaii, Kansas, Maine, Maryland, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Oregon, Utah, Vermont, and Washington.

<sup>42</sup> American Association of Naturopathic Physicians (AANP). Licensed States and Licensing Authorities [www.naturopathic.org/content.asp?pl=16&sl=57&contentid=57](http://www.naturopathic.org/content.asp?pl=16&sl=57&contentid=57). Accessed Feb. 6, 2015.

<sup>43</sup> AANP. Professional Education. [www.naturopathic.org/content.asp?contentid=56](http://www.naturopathic.org/content.asp?contentid=56). Accessed Feb. 6, 2015.

<sup>44</sup> Association of Accredited Naturopathic Medical Colleges (AANMC). Naturopathic Medicine FAQs. [www.aanmc.org/naturopathic/faq/#naturopathy](http://www.aanmc.org/naturopathic/faq/#naturopathy). Accessed Feb. 6, 2015.

Naturopathy is “defined by principles rather than by methods or modalities.” Above all, it honors the body’s innate wisdom to heal.<sup>45</sup>

Classical naturopathy training is guided by the following six principles. Students in naturopathy schools are taught to abide by these principles.<sup>46</sup>

- **First do no harm** (*Primum no nocere*). Illness is a purposeful process of the organism. The process of healing includes the generation of symptoms that are, in fact, an expression of the life force attempting to heal itself. Therapeutic actions should be complementary to and synergistic with this healing process. The naturopath’s actions can support or antagonize the actions of the *vis mediatrix naturae*, the healing power of nature. Therefore methods designed to suppress symptoms without removing the underlying causes are considered harmful and are to be avoided or minimized.
- **The healing power of nature** (*Vis mediatrix naturae*). The body has an inherent ability to establish, maintain and restore health. The healing process is ordered and intelligent; nature heals through the response of the life force. The naturopath’s role is to facilitate this process, to identify and remove obstacles to health and recovery, and to establish or restore a healthy internal and external environment.
- **Identify and treat the cause** (*Tolle causam*). Illness does not occur without cause. Underlying causes of disease must be discovered and removed or treated before a person can recover completely from illness. Symptoms express the body’s attempt to heal, but are not the cause of disease and, therefore, should not be suppressed by treatment. Causes may occur on many levels including the physical, mental, emotional and spiritual. The naturopath must evaluate fundamental underlying causes on all levels, directing treatment at root causes rather than at symptomatic expression.
- **Heal the whole person** (*Tolle totum*). Health and disease are conditions of the whole organism, a whole involving the complex interaction of many factors. The naturopath must treat the whole person by taking these factors into account. The harmonious functioning of physical, mental, emotional and spiritual aspects is essential to the recovery from and the prevention of disease. This requires a comprehensive approach to diagnosis and treatment.
- **The physician as teacher** (*Docere*). A cooperative doctor-patient relationship has inherent therapeutic value. The naturopath’s major role is to educate and encourage the patient to take responsibility for their own health. The naturopath is a catalyst for healthful change, empowering and motivating the patient to assume responsibility. It is the patient, not the doctor, who ultimately creates/accomplishes healing. Teaching with hope, knowledge and understanding, the naturopath acts to enable patients to heal.
- **Prevention** (*Praevenire*). The ultimate goal of any health care system should be prevention of disease. This is accomplished through education and the promotion of life habits that create good health. Naturopaths learn to assess risk factors and to sharpen their deductive reasoning, and to

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<sup>45</sup> American Cancer Society. Naturopathic Medicine.

[www.cancer.org/Treatment/TreatmentsandSideEffects/ComplementaryandAlternativeMedicine/MindBodyandSpirit/naturopathic-medicine](http://www.cancer.org/Treatment/TreatmentsandSideEffects/ComplementaryandAlternativeMedicine/MindBodyandSpirit/naturopathic-medicine). Accessed Feb. 6, 2015.

<sup>46</sup> Naturodoc. Principles of Naturopathic Medicine. [www.naturodoc.com/cardinal/naturopathy/nat\\_principles.htm](http://www.naturodoc.com/cardinal/naturopathy/nat_principles.htm). Accessed Feb. 5, 2015.

understand the patient's circumstances. Appropriate interventions are then sought to avoid further harm or risk to the patient. Building health works better and more surely than fighting disease.

## Naturopathic licensure<sup>47</sup>

In order to be licensed by a state or jurisdiction which requires licensing, naturopaths must:

1. Graduate from a four-year, professional-level program at a federally-accredited naturopathic medical school.
2. Study a curriculum which includes current medical science and traditional naturopathic theory.
3. Take and pass the Naturopathic Physicians Licensing Exam (NPLEX).

## Accrediting bodies

The Council on Naturopathic Medical Education (CNME) is presently accepted as the programmatic accrediting agency for naturopathic education by the four-year naturopathic colleges and programs in the United States and Canada, by the American and Canadian national naturopathic professional associations, and by the North American Board of Naturopathic Examiners.

The CNME-accredited programs in the United States are:

- Bastyr University in Kenmore, Wash. And San Diego, CA.
- National College of Naturopathic Medicine in Portland, Ore.
- National University of Health Sciences, Chicago, IL
- Southwest College of Naturopathic Medicine and Health Sciences in Tempe, Ariz
- University of Bridgeport (UB) College of Naturopathic Medicine in Bridgeport, CN

## Naturopath education

The Doctor of Naturopathic Medicine (N.D. or N.M.D.) or Doctor of Naturopathy (N.D.) degree programs lead to a doctoral degree in naturopathy.

According to the Association of Accredited Naturopathic Medical Colleges (AANMC), a naturopath's four-year education "use[s] the Western medical sciences as a foundation on which to build a thorough knowledge of holistic, non-toxic therapies and develop skills in diagnosis, disease prevention and wellness

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<sup>47</sup> Association of Accredited Naturopathic Medical Colleges (AANMC). Naturopathic Doctor Licensure. [www.aanmc.org/careers/licensure/](http://www.aanmc.org/careers/licensure/). Accessed Feb. 10, 2015.

optimization.”<sup>48</sup> After the first two years of general science education,<sup>49</sup> including basic and clinical sciences and diagnostics including: anatomy, biochemistry, human physiology, histology, human pathology, immunology, macro- and microbiology, neuroscience and pharmacology,<sup>50</sup> naturopathic students study clinical nutrition, botanical medicine, homeopathy, acupuncture and oriental medicine, lifestyle counseling, massage and physical medicine hydrotherapy.<sup>51</sup>

In years three and four, naturopathic students receive hands-on experience via clinical training and direct patient care. Generally, all naturopathic students’ clinical experience is gained through outpatient clinics. These clinical rotations may include specialization in organ system studies, physical medicine and naturopathic manipulative therapy.<sup>52</sup>

All CNME-accredited naturopathic<sup>53</sup> doctoral programs require candidates for graduation to participate in clinical rotations.<sup>54</sup> The clinical education program begins in the third year of naturopathic education and must devote at least 1,200 hours to direct patient contact in a clinical training.<sup>55</sup>

## Naturopath exam

In the states which license naturopaths, candidates for licensure are required to take the Naturopathic Physicians Licensing Exam (NPLEX).<sup>56</sup>

Candidates are eligible to sit for the NPLEX when they have met the biomedical science coursework requirement at an approved naturopathic medical program (ANMP), (i.e., when they have completed anatomy, physiology, biochemistry & genetics, microbiology & immunology, and pathology, and all required labs), and are currently enrolled in or have graduated within the last five (5) years from an approved naturopathic medical program.<sup>57</sup>

<sup>48</sup> AANMC. Naturopathic Physicians are Rigorously Trained. [www.aanmc.org/naturopathic/rigorously\\_trained](http://www.aanmc.org/naturopathic/rigorously_trained). Accessed Dec. 16, 2014.

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> *Id.*

<sup>52</sup> Some schools offer ND degrees as correspondence courses with little or no requirement for supervised clinical practice. Programs accredited by the CNME that offer an ND or NMD degree require clinical internship during the third and fourth years of study.

<sup>53</sup> “The Council on Naturopathic Medical Education (CNME) is a programmatic accrediting agency for the profession of naturopathic medicine. As such, it serves to ensure the high quality of naturopathic medical education in the United States and Canada through the voluntary accreditation of doctoral-level naturopathic medicine programs. Additionally, the Council sets standards for the approval of postdoctoral naturopathic residency programs (refer to the Council’s *Residency Handbook* for more information).” CNME. Handbook of Accreditation for Naturopathic Medicine Programs. [www.cnme.org/resources/2013\\_cnme\\_handbook\\_of\\_accreditation.pdf](http://www.cnme.org/resources/2013_cnme_handbook_of_accreditation.pdf). Accessed Dec. 16, 2014.

<sup>54</sup> Hough H, Dower C, and O’Neil E. Profile of a Profession: Naturopathic Practice. Center for the Health Professions: University of California, San Francisco, 2001.

<sup>55</sup> CNME. Handbook of Accreditation for Naturopathic Education Programs. 2013 Edition. [www.cnme.org/resources/2013\\_cnme\\_handbook\\_of\\_accreditation.pdf](http://www.cnme.org/resources/2013_cnme_handbook_of_accreditation.pdf) at 8. Accessed Dec. 15, 2014.

<sup>56</sup> AANMC. Accreditation for Naturopathic Medical Schools. [www.aanmc.org/schools/accreditation](http://www.aanmc.org/schools/accreditation) . Accessed Dec. 16, 2014.

<sup>57</sup> National American Board of Naturopathic Examiners (NABNE). Eligibility Requirements. [www.nabne.org/home/eligibility-requirements/](http://www.nabne.org/home/eligibility-requirements/). Accessed Dec. 16, 2014.



An **approved naturopathic medical program** is a program that has accreditation or pre-accreditation from the CNME and offers a minimum four-academic-year, in-residence curriculum in basic (biomedical) science and clinical didactic studies, as well as clinical (experiential) training leading to an N.D. degree (United States) or diploma (Canada).

The NPLEX is a two-part exam<sup>58</sup> which covers basic sciences, diagnostic and therapeutic subjects, and clinical sciences:<sup>59,60</sup>

- **Part I (Biomedical Science Examination)** - A single, 200-item examination covers the topics of anatomy, physiology, biochemistry & genetics, microbiology & immunology, and pathology.
- **Part II (Core Clinical Science Examination)** – Consists of 90-100 case clusters (400 items) that cover diagnosis (physical, clinical, and lab), diagnostic imaging, botanical medicine, nutrition, physical medicine, homeopathy, health psychology, emergency medicine, medical procedures, public health, pharmacology, and research. The examination is comprised of a series of clinical summaries followed by several questions pertaining to each patient's case.

## Naturopath residency

Naturopathic post-graduate training is neither common nor required of graduates of naturopathic schools except in the state of Utah, (which currently requires one year of post-graduate naturopathic training). Some naturopathic students may choose to shadow or practice with an experienced naturopath before setting up their own practice,<sup>61</sup> while others may choose residencies. Literature indicates that only 5-10 percent of naturopaths participate in an approved residency.<sup>62</sup>

Each of the five CNME-accredited naturopathic schools offers a one-year post-doctoral training program. These “residencies” may include placement in naturopathic clinics or private practices, where naturopathic philosophy and treatment are applied to patients in primary care, pediatrics, emergency care, pharmacy compounding, geriatrics, nutritional counseling and obstetrics.<sup>63</sup>

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<sup>58</sup> There are also two elective examinations (Minor Surgery and Acupuncture) which are required in only some jurisdictions. Each 75-item examination is comprised of 10-15 case clusters (a brief clinical presentation followed by 3-5 items pertaining to that case). Examinees are allowed 90 minutes (1 ½ hrs.) to complete each elective examination. North American Board of Naturopathic Examiners. NPLEX Examination Overview. [www.nabne.org/nabne\\_page\\_8.php#aboutexams](http://www.nabne.org/nabne_page_8.php#aboutexams). Accessed Dec. 15, 2014.

<sup>59</sup> AANMC. Naturopathic Doctor Licensure. [www.aanmc.org/careers/licensure/](http://www.aanmc.org/careers/licensure/). Accessed Dec. 15, 2014.

<sup>60</sup> *Id.*

<sup>61</sup> AANMC. Comparing ND & MD Curricula. [www.aanmc.org/schools/comparing\\_nd\\_md\\_curricula](http://www.aanmc.org/schools/comparing_nd_md_curricula). Accessed Dec. 15, 2014. Only 5 to 10 percent of new NDs participate in formally approved residency positions, all of which are associated with colleges approved as residency sponsors by the Council on Naturopathic Medical Education (CNME).

<sup>62</sup> *Id.* Bastyr University, for example, does have a residency that is one year where the residents progress from “a purely observational role into an independent role.” Bastyr University. Postdoctoral Training: Naturopathic Medicine Residency Program. [www.bastyr.edu/academic/profiles/ndres.asp](http://www.bastyr.edu/academic/profiles/ndres.asp). Accessed Dec. 15, 2014.

<sup>63</sup> Bastyr University [www.bastyr.edu](http://www.bastyr.edu). National College of Natural Medicine [www.ncnm.edu](http://www.ncnm.edu). Southwest College of Naturopathic Medicine and Health Sciences. [www.scnm.edu](http://www.scnm.edu). University of Bridgeport–College of Naturopathic Medicine [www.bridgeport.edu/pages/3240.asp](http://www.bridgeport.edu/pages/3240.asp). Accessed Dec. 15, 2014.

In 2005 the CNME implemented an approval process for naturopathic post-graduate training programs. In terms of program content, CNME requires that the participant identify learning goals of the residency experience, participate in supervised clinical practice, receive a minimum of 35 hours a year of didactic instruction either onsite or via distance education, and participate in “scholarly activities that promote a spirit of inquiry, scholarship and critical thinking, such as discussions, rounds, study clubs, presentations, conferences, and local, regional or national professional associations and scientific societies.”<sup>64</sup> Naturopath residencies must be a minimum of 12 months.<sup>65</sup>

Naturopathic post-graduate training is neither common nor required in most states.

## Naturopath certification

A naturopath may achieve voluntary certification through one of several organizations, although the American Naturopathic Certification Board (ANCB)<sup>66</sup> claims to be the only national certification board in the United States, and this certification is voluntary.<sup>67</sup> Certification can be obtained from ANCB by passing a valid exam and committing to annual continuing education.

Several states require licensed naturopaths to obtain specialty certification in order to provide certain health care services. For example, it is common for states to require naturopaths to achieve certification in naturopathic childbirth or acupuncture if the ND wants to provide those services.

### Maintenance of Certification

For naturopaths to maintain their ANCB certification, they are required to complete ten hours of continuing education or “CEU” annually.<sup>68</sup>

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<sup>64</sup> CNME. The Handbook on CNME Postdoctoral Naturopathic Medical Education Sponsor Recognition Process and Standards. [www.cnme.org/resources/2012\\_cnme\\_residency\\_handbook.pdf](http://www.cnme.org/resources/2012_cnme_residency_handbook.pdf). Accessed Dec. 15, 2014.

<sup>65</sup> *Id.*

<sup>66</sup> American Naturopathic Certification Board (ANCB). Becoming Board Certified. [www.ancb.net/?page\\_id=90](http://www.ancb.net/?page_id=90). Accessed Dec. 15, 2014.

<sup>67</sup> *Id.*

<sup>68</sup> ANCB. Renew Your ANCB Certification. [www.ancb.net/?page\\_id=51](http://www.ancb.net/?page_id=51). Accessed Feb. 6, 2015.

## State advocacy issues

These modules are intended to provide policymakers with objective information to aid in making sound legislative and regulatory decisions on scope of practice issues. Below are some recent issues states have faced regarding naturopaths.

### Naturopath licensure versus no licensure or regulation

Naturopaths' scope of practice varies by state. Through their state chapters, *some* naturopaths seek to establish:

- licensure in the 50 states and expanded scope of practice
- liberal prescribing authority, including the authority to prescribe controlled substances
- “primary care physician” status
- legislation to include NDs in Medicare, in the VA health care system, and mandated insurance coverage for services.<sup>69</sup>

Other, “traditional” naturopaths **do not seek** state recognition or regulation through licensure. Traditional naturopaths, collectively represented by the American Naturopathic Medical Association (ANMA), actively oppose the licensure of naturopathy in any form, preferring to practice natural health care unlicensed. Traditional naturopaths believe that licensure takes away their right to practice natural health care. In fact, testimony from the ANMA or individual traditional naturopaths opposing the licensure of naturopaths can often be found in the legislative dockets of many states, and the ANMA offers sample language for its members to write their elected representatives against licensing of naturopaths.<sup>70</sup>

On the other hand, naturopathic physicians frequently argue that licensure allows patients the freedom to choose their own type of primary health care provider. At the same time naturopathic physicians are looking to distinguish themselves from and assert privileges over their colleagues, the traditional naturopaths. A wide schism separates these two factions, which have a long, documented history of philosophical differences culminating in the divergence of the “naturopathic physician” (and the corresponding quest for state licensure) from the non-medical practice of traditional naturopathy.

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<sup>69</sup> Naturopathic Physicians: Natural Medicine. Real Physicians. Advocacy Priorities 2015. [www.naturopathic.org/article\\_content.asp?edition=101&section=156&article=965](http://www.naturopathic.org/article_content.asp?edition=101&section=156&article=965). Accessed Dec. 16, 2014.

<sup>70</sup> In fact, the ANMA offers a sample letter on its website for their members to write their elected representatives on the licensing issue which states that “Naturopaths, Naturopathic Doctors, or Naturopathic Physicians have no business diagnosing, dispensing drugs, or performing surgeries as set out in the legislation in question. Naturopaths, Naturopathic Doctors or Naturopathic Physicians simply don’t have the experience or education required. When diagnosing, dispensing drugs, or performing surgeries is needed, clients should see those licensed and trained to do so. You owe it to the public to protect them from the group seeking this scope of practice for naturopaths. You should require those people to attend traditional medical school. ANMA Naturopathic Legislation. [www.anma.org/writingyourrepresentative.html](http://www.anma.org/writingyourrepresentative.html). Accessed Feb. 6, 2015.

As of the time of publication, 18 states<sup>71</sup> and the District of Columbia licensed naturopaths. However, naturopaths may practice without a license in states where naturopathy is not expressly prohibited. In a few such states, this has provoked concern over whether naturopathic practitioners treating patients should be subject to some sort of state regulation (in the form of limited licensure, certification or registration) as a means to protect the public.

According to a 2003 article in MedScape General Medicine, “without licensing standards, individuals with little or no formal education may proclaim themselves naturopathic physicians without medical school education or board testing. ... [T]he clear message is that such licensing implies competence. There is, however, no evidence that ‘educated’ naturopaths—i.e., the NDs or NMDs—are more competent than others. If anything, ‘traditional naturopaths’ (i.e., those who did not attend the ‘approved’ schools) may be less of a threat to public health because they do not pretend to be primary care physicians.”

## Prescriptive authority

Naturopaths are increasingly seeking legislative approval for the authority to prescribe medication, including controlled substances.<sup>72</sup> Indeed, naturopathic beliefs are rooted in vitalism, the pre-20th-century assertion that biological processes do not conform to universal physical and chemical principles. Naturopaths describe a healing power of nature that is compromised by modern medicine. For these reasons, as stated by the American Naturopathic Medical Association, “Requests for expanding their prescriptive rights alone prove their real interest in healthcare is not naturopathic.”<sup>73</sup>

In part due to these beliefs, naturopaths are largely anti-vaccine, deferring to statements regarding patient choice. A 2010 study found that pediatric use of naturopaths in Washington State was significantly associated with reduced adherence to recommended pediatric vaccination schedules and with acquisition of vaccine-preventable disease.<sup>74</sup>

At the same time, data indicates that naturopaths write exceedingly high rates of prescriptions for medical marijuana in those states that allow the practice. According to a November 2014 medical marijuana report published by the Arizona Department of Public Services, naturopaths wrote about 75 percent of the roughly 52,000 medical marijuana certifications from July 2013 to June 2014, despite having a small number of providers.

While naturopaths will point to minor pharmaceutical training included in curricula for schools of naturopathy, it is important to note that there is no naturopathic standard of care, and that many naturopathic therapies have not enjoyed the rigorous scientific study of those pharmacotherapies taught in osteopathic and allopathic schools of medicine. Granting naturopaths the right to prescribe is therefore a dangerous proposition.

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<sup>71</sup> AL, AZ, CA, CO, CT, DC, HI, KS, MA, MD, ME, MN, MT, NH, ND, OR, UT, VT, WA.

<sup>72</sup> Washington House Bill 4573 (2014) proposed that naturopaths be allowed to prescribe and administer Schedule II through V controlled substances. North Dakota SB 2194 (2015) proposed that naturopaths be allowed to prescribe and administer any prescription drug included on a formulary established by the board of naturopathy.

<sup>73</sup> ANMA. Letter to Washington State Department of Health. September 24, 2014.

<sup>74</sup> Downey LI, Tyree PT, Huebner CE, et al. Pediatric vaccination and vaccine-preventable disease acquisition: associations with care by complementary and alternative medicine providers. *Child Health J.* 2010;14(6):922-30.

Moreover, naturopathy has long been considered by many state legislatures and the public as the natural practice of healthcare. To grant the right to prescribe any form of drug to the naturopath is not only dangerous, but also confusing to the public.

## Official state reports on naturopathy

Many states have commissioned investigative reports or special committees to study the issues related to licensure, or in states where naturopaths currently enjoy licensure, issues related to the expansion of scope-of-practice privileges. Most of these state legislative or agency reports exhibit significant research into the history of the naturopathic profession, nationally and within the state, as well as other states' experiences with naturopath licensure and/or professional regulation. These reports are excellent resources for those states anticipating licensure or scope of practice expansion proposals by naturopaths.

### Arizona (2000)

In 2000 the Arizona Office of the Auditor General conducted an audit and sunset review<sup>75</sup> of the Arizona Naturopathic Physicians Board of Medical Examiners pursuant to a June 16, 1999, resolution of the Joint Legislative Audit Committee. This audit noted significant concerns with the operative processes of the Arizona board, potentially attributable to lack of oversight. (Note: The Arizona Naturopathic Physicians Board of Medical Examiners was established in 1935 to regulate naturopathic physicians through licensure. Naturopaths were once restricted to using natural, drugless and nonsurgical methods, however, in 1992 the law was changed to allow naturopaths to perform many of the same activities performed by allopathic and osteopathic physicians.)

The audit report also concluded that the Arizona board needed to improve complaint processing to ensure that complaints were resolved in a timely and appropriate manner. At the time of the review, it had developed a backlog of cases. Of 13 unresolved complaints, five had been open for more than 1,000 days.<sup>76</sup>

The audit report also noted that Arizona naturopaths enjoyed the most liberal scope of practice and prescribing formulary in the nation, and suggested the Legislature review the board's statutes in order to ascertain whether "the Legislature intended such an extension of naturopaths' activities." With regard to the Arizona board's proposal to recognize 16 specialties within naturopathy, including family medicine and minor surgery, internal medicine, neurology and psychiatry, and ophthalmology, the report authors concluded, "No other state that regulates naturopaths recognizes such a broad range of specialties."<sup>77</sup>

The audit report authors also suggested the Legislature review the Arizona Naturopathic Physicians Board of Medical Examiners statutes to determine if increased oversight should be provided on what prescriptions naturopaths can write. "The Board's statutes require it to develop a list of 'natural substances' that naturopaths can prescribe, but the statutes do not define what 'natural substances' are. The Board has developed an extensive list, or formulary, that includes not only vitamins and minerals, but also vaccines, antibiotics, oral contraceptives, anabolic steroids, and controlled substances such as morphine and cocaine.

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<sup>75</sup> State of Arizona Office of the Auditor General. Naturopathic Physicians Board of Medical Examiners (June 2000, Report No. 00-9).

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

The U.S. Drug Enforcement Administration has recently approved Arizona naturopaths to prescribe controlled substances from the formulary because this appears to be in accordance with state law. Although some other states allow naturopaths to prescribe and dispense drugs, none has a list as extensive as what the Board has developed. Most of these states also have separate oversight bodies to develop or review the list, while Arizona does not.”<sup>78</sup>

Most importantly, however, the Arizona Auditor General’s Office found a disturbing lack of valid competency assessment of candidates for naturopathic licensure in the state (emphasis added):

The Board needs to correct numerous problems with its three-part licensing examination, or adopt a national examination, to ensure that the naturopaths it licenses are competent. Since 1997, the Board has been administering a licensing examination it developed specifically for Arizona. Problems with this examination call into question its validity as a tool for measuring an applicant’s competence to practice naturopathy. For example, the Board has not ensured that the examination tests what a naturopath would need to know to practice safely and has not shown that examination writers possess the necessary expertise and training to develop test questions. Further, the Board has made extensive adjustments to examination scores. For example, one licensure applicant received credit for 90 questions that she had answered incorrectly on one part of the February 1999 exam. As a result of such scoring adjustments, no one has failed the Board’s exam since September 1998.

The shortcomings noted in the Auditor General’s report indicate a serious and disconcerting lack of regard for public safety. The failure of the naturopathic profession in the state of Arizona to address professional complaints in a timely manner, to ensure the administration of licensing examinations of sufficient quality so as to protect the public from dangerous practitioners, and to maintain their professional scope of practice within the areas for which naturopaths are educated and trained, should instill a lack of public confidence in the naturopathic profession in Arizona.

## Colorado (2005)

The state of Colorado performed a sunrise review of naturopaths in 2005.<sup>79</sup> The Colorado report found that naturopaths in the state presented evidence supporting their proposal request for state licensure and regulation. This report contains a valuable compilation of other states’ licensure and scope of practice regulations for naturopaths as of 2005. For instance, the Colorado report illustrates the lack of recognized safeguards prevalent in the licensed practice of naturopathy in the United States:

- Four out of 15 states do not require licensed naturopaths to partake in any continuing medical education whatsoever.
- Only three out of 15 states mandate that licensed naturopaths carry professional liability insurance.

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<sup>78</sup> *Id.*

<sup>79</sup> Colorado Department of Regulatory Agencies, Office of Policy, Research and Regulatory Reform. 2005 sunrise review of naturopathic physicians.



Additionally, the Colorado report provides an excellent psychometric analysis of the Naturopath Physicians Licensing Examination (NPLEX). The Colorado Office of Examination Services performed an analysis of the NPLEX test construction and scoring methods, and made several key observations<sup>80</sup>.

- To date, there is little generalizable evidence that NPLEX Part II clinical licensing examinations actually measure clinical competence.
- The thirteen years of NPLEX examination statistics presented ... indicate that the band within which we can be reasonably sure an examinee's true score lies can be variable and somewhat concerning if we are drawing conclusions about technical knowledge of a candidate based on his/her particular test score.

Unlike the NPLEX, the United States Medical Licensing Examination and the Comprehensive Osteopathic Medical Licensing Examination are three-part licensing examinations, each containing a separate Step/Level 3 that specifically assesses whether the examinee can apply medical knowledge and understanding of biomedical and clinical science essential for the unsupervised practice of medicine, with emphasis on patient management in ambulatory settings. Step/Level 3 provides a final assessment of physicians assuming independent responsibility for delivering general medical care.

## Florida (2004)

The "2004 Sunrise Report on Proposed Licensure of Naturopathic Physicians" concluded that there is "potential risk from licensing naturopathic physicians to allow them to provide a broad range of primary care services." The state of Florida abolished its licensing provisions for naturopathy in 1959, grandfathering in several practicing naturopaths who had been licensed at that time. The 2004 report was conducted as proponents for naturopathy again sought licensure in the state.

The authors of the report concluded that<sup>81</sup>:

- The proponents of regulation did not provide evidence that there is substantial harm or that the public is endangered from the unregulated practice of the profession.
- The department and other sources indicate there is a risk of harm to the public from licensing naturopathic physicians with an expanded scope of practice.

## Massachusetts (2002)

A legislative commission to study naturopathy and the prospect of licensure was established at the request of naturopaths in Massachusetts. In 2002 the Majority and Minority of the Massachusetts Special Commission on Complementary and Alternative Medical Practitioners presented their reports.<sup>82</sup>

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<sup>80</sup> *Id.*

<sup>81</sup> Sunrise report on proposed licensure of naturopathic physicians. January 2004. Available at [www.naturowatch.org/licensure/flasunrise2004.html](http://www.naturowatch.org/licensure/flasunrise2004.html). Accessed July 12, 2012.

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Although the majority report recommended licensure for naturopaths be granted, the minority of the special commission felt compelled to submit its own report, highlighting significant deficiencies in the majority's fact-finding process and in the information presented within the majority report. The minority report provides extensive examples of the unscientific basis for naturopathic treatment and calls into question the failure of the majority to report on the validity of treatments used by naturopaths in the care of patients. "Those [members of the commission] favoring licensure of naturopaths did not show an interest in investigating the validity of naturopathic practices. We ask the legislature to question why the proponents of naturopathy did not discuss the validity of specific naturopathic practices."

In addition, the minority report contains detailed significant findings related to the education and practice of naturopaths.<sup>83</sup> "Evidence shows that the course content of naturopathy schools is filled with unscientific assertions that strain credulity. ... Evidence was presented showing that both graduates and practicing naturopaths lack experience in recognition of disease and effects of treatment."

The authors of the minority report assert a logical approach in opposing licensure to naturopaths. "Standard naturopathic practice is substandard medical practice. Thus, an independent naturopathic board would legitimize unacceptable practices. ... [T]hus, the establishment of a self-regulating naturopathic board would, paradoxically, endorse practices that would be grounds for discipline if performed by a physician."

Though professional collaboration should be the norm among health professionals, the authors of the minority report state that serious problems would arise with regard to professional collaboration should naturopaths be granted licensure in Massachusetts. First, they argue, naturopaths by their very training are disinclined to refer patients for conventional medical care. Naturopaths consider naturopathy to be a "distinct system of complementary health care," not complementary to conventional medical care. In fact, the authors note that every naturopathic treatise or professional literature denigrates modern medicine as "treating only the symptoms, not the cause" of disease, and warns the reader about pharmaceuticals, which are consistently referred to as "toxins."<sup>84</sup> Therefore, it is highly unlikely, the authors conclude, that a naturopath would refer a patient to a physician for medical care.

These statements are corroborated by a 1999 study published in the Archives of Pediatric and Adolescent Medicine. Using professional naturopathic associations to identify possible subjects, the author surveyed practicing naturopaths and homeopaths in Massachusetts. Results showed that nearly all respondents reported treating children, but fewer than half of the responding practitioners reported any formal pediatric training. Most practitioners reported that they did not actively recommend immunizations and fewer than half of the nonphysician practitioners reported that they would refer a two-week-old neonate with a fever to a medical doctor or emergency medical facility. The author concluded that many of the patients using homeopathy and

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<sup>82</sup> Minority report of the Massachusetts Special Commission on Complementary and Alternative Medicine Providers, 2003. [www.quackwatch.org/01QuackeryRelatedTopics/Naturopathy/minority.pdf](http://www.quackwatch.org/01QuackeryRelatedTopics/Naturopathy/minority.pdf). Accessed July 12, 2012.

<sup>83</sup> *Id.*

<sup>84</sup> *Id.*

naturopathy are children. “Failure on the part of these providers to recommend immunizations or recognize potentially serious illnesses is cause for concern.”<sup>85</sup>

The Massachusetts minority report also notes that the medical code of ethics precludes physicians from collaborating with unscientific practitioners, such as naturopaths. In particular, AMA Ethical Opinion E-3.01 is referenced, which reads:

It is unethical to engage in or to aid and abet in treatment which has no scientific basis and is dangerous, is calculated to deceive the patient, by giving false hope, or which may cause the patient delay in seeking proper care.

The report of the majority, as mentioned above, does not include any information on the safety, efficacy or scientific validity of naturopathic treatments. Instead, it provides recommendations for an administrative framework to support the implementation of naturopath licensure, as well as training standards for licensure that mirror the requirements of the accrediting body for naturopathic schools. Although presented with textbooks used in naturopathy schools, the majority “was not able to determine the quality or reliability of these books or the standards used in developing them.”<sup>86</sup>

There is at least one statement in the majority report that is untrue. Under the section entitled “Criteria that suggest the need for licensure,” the majority truthfully states that the accreditor of naturopathy schools, the Council on Naturopathic Medical Education (CNME), is a private accrediting agency not recognized by the federal government. The report then incorrectly states that the accrediting body for conventional medical schools is similarly not recognized by the federal government.<sup>87</sup>

Nothing is further from the truth. The Liaison Committee on Medical Education, the accreditor of U.S. medical schools, has been continuously recognized by the U.S. Department of Education since 1952.<sup>88</sup> Instead, it was the CNME that had its recognition from the U.S. Department of Education revoked in 2001 (just prior to the release of the majority and minority Massachusetts reports) for failure to apply its own standards to a naturopathy school in candidate status for accreditation. At the time of the Massachusetts Commission’s reports, the CNME was not recognized by the Department of Education, while the Liaison Committee on Medical Education previously had been and continues to be recognized by the Department of Education as the sole accreditor of U.S. medical schools awarding the MD degree. Likewise, the American Osteopathic Association’s Commission on Osteopathic College Accreditation is recognized by the Department of Education as the sole accreditor of U.S. osteopathic medical colleges awarding the DO degree.<sup>89</sup>

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<sup>85</sup> Lee AC, Kemper KJ. Homeopathy and naturopathy: practice characteristics and pediatric care. Arch Pediatr Adolesc Med. 2000 Jan;154(1):75-80.

<sup>86</sup> *Supra* note 82.

<sup>87</sup> *Id.*

<sup>88</sup> U.S. Department of Education. Specialized accrediting agencies.

[www.ed.gov/admins/finaid/accred/accreditation\\_pg8.html#med](http://www.ed.gov/admins/finaid/accred/accreditation_pg8.html#med). Accessed October 22, 2013.

<sup>89</sup> *Id.*

## Missouri (2006)

A 2006 Report of the Senate Interim Committee on Naturopathic Medicine in Missouri<sup>90</sup> noted significant concerns with the education and standardized testing of naturopaths:

Questions have been raised as to the extent to which the NPLEX (the Naturopathic Licensing Examination) effectively measures competency. ... Unlike the NPLEX, the USMLE (U.S. Medical Licensing Exam) has a third part (USMLE Part III) designed to test clinical competence and “assess whether medical graduates can apply medical knowledge and understanding of biomedical and clinical science essential for the unsupervised practice of medicine.” The Committee views the absence of such an evaluation as a significant flaw in the NPLEX.

The main accrediting organization for naturopathic colleges has been in and out of favor with the U.S. Department of Education. ... As a result, the Committee does not have full faith in the diligence of the CNME as an accrediting body.”

Finally, emphasizing the inadequacy of the evidence presented them by proponents for naturopathic licensure, and also echoing public confusion regarding the qualifications of naturopaths, the committee concluded,

“it remains unclear to the committee ... who is a naturopath or what makes one a naturopath. This is a fundamental and necessary question that the committee was unable to determine.”<sup>91</sup>

## Medical care should be premised on scientific evidence

For medical professionals and policymakers alike, the naturopathic profession’s reluctance and/or inability to apply evidence-based principles and scientific study its treatment modalities is of great concern. For example, naturopaths’ longstanding opposition to childhood vaccination has been demonstrated as recently as 1999, well after the remarkable decreases in childhood disease as a result of widespread vaccination had been documented.

The mechanism of action and the efficacy of many naturopathic treatment modalities are not scientifically supported; yet practitioners of naturopathy continue to offer patients such treatments. Such behavior would not be tolerated in the practice of medicine. Care that is not premised on scientific evidence, and for which the patient is not informed of its experimental nature, would be considered unethical by the standards of the medical profession. Specifically, AMA Ethical Opinion E-3.01 states: “It is unethical to engage in or to aid and abet in treatment which has no scientific basis and is dangerous, is calculated to deceive the patient by giving false hope, or which may cause the patient to delay in seeking proper care...”

When faced with the claims of naturopaths that the rigors of their education and licensing exams parallel those of physicians, legislators should recognize that graduates of campus-based, four-year naturopathic programs who have passed a standardized examination may demonstrate consistency from one naturopathic

<sup>90</sup> Report of the Senate Interim Committee on Naturopathic Medicine. Prepared by Chris Hogerty, Senate Research Staff. January 20, 2006. [www.senate.mo.gov/06info/comm/interim/sinm/NaturopathReport.pdf](http://www.senate.mo.gov/06info/comm/interim/sinm/NaturopathReport.pdf). Accessed June 15, 2015.

<sup>91</sup> *Id.*

practitioner to the next. But that says nothing about the validity of their practice, which can be determined only by reference to the laws of science or nature, and by rigorous testing of biologically plausible claims.

Care that is not premised on scientific evidence, and for which the patient is not informed of its experimental nature, would be considered unethical by the standards of the medical profession.

## Conditions naturopaths claim they are educated and trained to treat

Naturopathic physicians claim they are trained as primary care providers, and as such, are educated and trained to diagnose, manage and treat many conditions, including emergency medicine, psychology, pharmacology, and minor surgery.<sup>92</sup> In each of the examples below, it is important to note that naturopathic physicians' education generally comprises only four years and 4,100 clinical hours, compared to physicians' seven years and more than 10,000 hours of medical education and training. Physicians' education and training is key to the safe and accurate diagnosis, treatment and management of disease.

Physicians are specifically trained to recognize when a symptom may mask an underlying condition. While the treatments cited below may not always be harmful, the AMA is concerned that the treatment of a clearly visible symptom may mask an underlying condition – thereby putting the patient at heightened risk if the naturopathic physician falsely believes that the patient is “cured” because there is a temporary decrease in symptoms. This is an example of a situation where a physician's education and training has the comprehensiveness necessary for treating the broad range of potential conditions and disease.

### Bloodstream infections

An Arizona clinic cites the use of ultraviolet blood irradiation or photoluminescence therapy to combat bloodstream infection, possibly in people who suffer from chronic disease such as cancer, diabetes and arthritis.<sup>93</sup> In comparison to naturopaths' four years of education and training, hematologists have 8-10 years of training<sup>94</sup>, medical oncologists have nine years of training,<sup>95</sup> endocrinologists have nine years of training<sup>96</sup>

<sup>92</sup> The AANP web site states “NDs treat all medical conditions.” AANP [www.naturopathic.org/content.asp?pl=16&sl=60&contentid=60](http://www.naturopathic.org/content.asp?pl=16&sl=60&contentid=60). Accessed Dec. 16, 2014.

<sup>93</sup> Scottsdale Natural Medicine and Healing Clinic LLC *Ultraviolet Blood Irradiation or Photoluminescence Therapy* (last visited June 23, 2011).

<sup>94</sup> Hematologists have four years of medical school training, three years of training in internal medicine residency and two years of training in the hematology fellowship. ACGME Program Requirements for Graduate Medical Education in Hematology. [www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/145\\_hematology\\_int\\_med\\_07132013.pdf](http://www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/145_hematology_int_med_07132013.pdf). Accessed Dec. 16, 2014..

<sup>95</sup> Two additional years of training after an internal medicine residency (three years) and following medical school (four years). ACGME Program Requirements for Graduate Medical Education in Medical Oncology [www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/147\\_medical\\_oncology\\_int\\_med\\_07132013.pdf](http://www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/147_medical_oncology_int_med_07132013.pdf). Accessed Dec. 16, 2014.

<sup>96</sup> *Id.*

and rheumatologists have nine years of training.<sup>97</sup> Each of these physician specialists is expert in bloodstream infections.

## Constipation and irritable bowel syndrome

In Idaho, some naturopaths claim that they can offer relief for “constipation, diarrhea, heartburn, indigestion, food allergies, bloating, irritable bowel syndrome.”<sup>98</sup> The question is, if these symptoms are “relieved,” is the naturopathic relief masking a more serious issue that is causing the symptoms? For example, cardiac and intestinal motility problems can mimic heartburn,<sup>99</sup> and should be analyzed by the proper health care provider and not simply treated as heartburn. Gastroenterologists specialize in bowel-related symptoms and disease as part of their 10 years of medical education and training.<sup>100</sup> While the naturopaths may be able to recognize and treat the symptoms, their training does not favorably compare with a physician’s ability to recognize the underlying issues that may cause “common” symptoms.

## Heart disease

Naturopaths often cite chelation as a successful solution for “vascular disease such as atherosclerosis as well as heavy metal poisoning.”<sup>101</sup> The AMA believes, however, that chelation therapy for atherosclerosis is an experimental process without proven efficacy.<sup>102</sup> In addition, there is no scientific documentation that the use of chelation therapy is effective in the treatment of cardiovascular disease, atherosclerosis, rheumatoid arthritis, or cancer. If chelation therapy is to be considered a useful medical treatment for anything other than heavy metal poisoning, hypercalcemia or digitalis toxicity, it is the responsibility of its proponents to conduct properly controlled scientific studies, to adhere to Federal Drug Administration (FDA) guidelines for drug investigation, and to disseminate study results in the usually accepted channels.<sup>103</sup> In addition, in comparison

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<sup>97</sup> ACGME Program Requirements for Graduate Medical Education in Rheumatology (Internal Medicine) [www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/150\\_rheumatology\\_int\\_med\\_07132013.pdf](http://www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/150_rheumatology_int_med_07132013.pdf). Accessed Dec. 16, 2014. Two years of rheumatology training following three years of internal medicine and four years of medical school.

<sup>98</sup> Lakeside Holistic Health, PLLC. Conditions Naturopathic and Oriental Medicine Can Help. [www.lakesideholistic.com/OurServices/NaturopathicMedicine.aspx](http://www.lakesideholistic.com/OurServices/NaturopathicMedicine.aspx). Accessed Dec. 16, 2014.

<sup>99</sup> WebMD *Heartburn Symptoms* [www.webmd.com/heartburn-gerd/guide/heartburn-symptoms](http://www.webmd.com/heartburn-gerd/guide/heartburn-symptoms) (last visited August 19, 2011).

<sup>100</sup> A gastroenterology fellowship is three years, and must follow a three year internal medicine residency following four years of medical school. [www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/144\\_gastroenterology\\_int\\_med\\_07132013.pdf](http://www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/144_gastroenterology_int_med_07132013.pdf). Accessed Dec. 16, 2014.

<sup>101</sup> “Chelation therapy is an intravenous therapy using the synthetic amino acid “EDTA” (ethylene diamine tetra-acetic acid) to detoxify the body by bonding with the toxic metals in the body and carrying them away in the urine.” New Hampshire Natural Health Clinic. Chelation Therapy. [www.nhnatural.com/services/chelationtherapies.html](http://www.nhnatural.com/services/chelationtherapies.html). Accessed Dec. 16, 2014.

<sup>102</sup> AMA Policy H-175.997 Chelation Therapy.

<sup>103</sup> *Id.*

to the naturopaths' limited education and training, the AMA notes that cardiologists spend three years studying vascular disease as part of their 10+ years of medical education and training<sup>104</sup> to ensure that patients with heart disease and related conditions receive the most effective solutions and remedies.

## Auto-immune disorders

An Oregon naturopath claims to specialize in auto-immune disorders, fatigue and thyroid disorders, fibrocystic breast disease and many other conditions and practices, including family practice.<sup>105</sup> It bears repeating that naturopaths generally only have four years total of training. In comparison, family practitioners have seven years of comprehensive medical training, and neurologists undergo at least four years of focused study<sup>106</sup> as part of their eight years of total education and training including medical school. Rheumatologists have nine years of study,<sup>107</sup> and radiation oncologists<sup>108</sup> have an additional five years of highly specialized medical education and training after medical school.

## Conclusion

The AMA believes a state legislator who is considering licensing naturopaths to provide a specific scope of practice and range of services to patients should understand the differences in education and training between naturopaths and physicians. It is the responsibility of policy-makers to ensure that naturopaths' claims that they can treat a broad range of conditions are backed by facts – facts that include the specific education and training necessary to ensure patient safety.

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<sup>104</sup> ACGME Program Requirements for Graduate Medical Education in Cardiovascular Disease  
[www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/141\\_cardiovascular\\_disease\\_int\\_med\\_07132013.pdf](http://www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/141_cardiovascular_disease_int_med_07132013.pdf).  
 Accessed Dec. 16, 2014.

<sup>105</sup> Dr. Donald McBride, N.D. Philosophy. [drdonaldmcbride.com/](http://drdonaldmcbride.com/). Accessed Dec. 16, 2014.

<sup>106</sup> ACGME Program Requirements for Graduate Medical Education in Neurology  
[www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/148\\_nephrology\\_int\\_med\\_07132013.pdf](http://www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/148_nephrology_int_med_07132013.pdf). Accessed  
 Dec. 16, 2014.

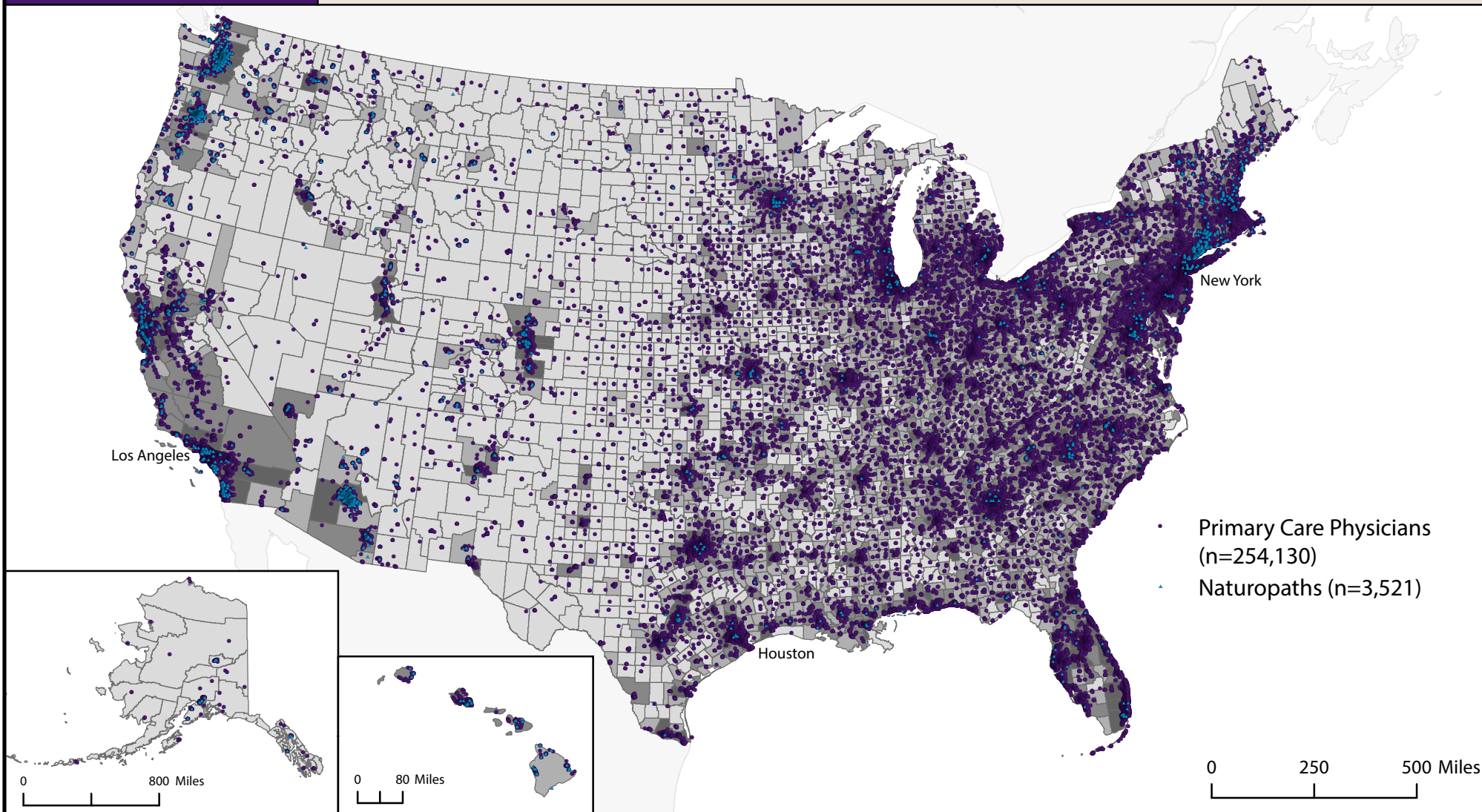
<sup>107</sup> ACGME Program Requirements for Graduate Medical Education in Rheumatology (Internal Medicine)  
[www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/150\\_rheumatology\\_int\\_med\\_07132013.pdf](http://www.acgme.org/acgmeweb/Portals/0/PFAssets/2013-PR-FAQ-PIF/150_rheumatology_int_med_07132013.pdf).  
 Accessed Dec. 16, 2014. Two years of rheumatology training following three years of internal medicine and four years of medical school.

<sup>108</sup> ACGME Program Requirements for Graduate Medical Education in Radiation Oncology  
[www.acgme.org/acgmeweb/Portals/0/PFAssets/ProgramRequirements/430\\_radiation\\_oncology\\_07012014.pdf](http://www.acgme.org/acgmeweb/Portals/0/PFAssets/ProgramRequirements/430_radiation_oncology_07012014.pdf).  
 Accessed Dec. 16, 2014.



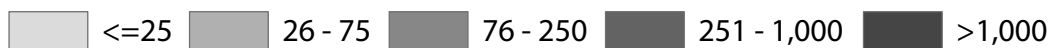
# Primary Care Physicians to Naturopaths

## United States



### Population per square mile

Source: 2012 American Community Survey







## Advocacy Resource Center

Advocating on behalf  
of physicians and patients  
at the state level

# State law chart: Naturopath licensure and scope of practice

## Licensure

Currently, 19 states<sup>1</sup> and the District of Columbia have licensing or regulation laws for naturopaths. In these states, naturopathic doctors are required to graduate from an accredited four-year residential naturopathic medical school and pass a postdoctoral board examination (NPLEX) in order to receive a license. Licensed naturopathic physicians must fulfill state-mandated continuing education requirements annually, and will have a specific scope of practice defined by their state's law. The states that currently have licensing laws for naturopathic physicians are:

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<sup>1</sup> Alaska, Arizona, California, Colorado, Connecticut, Hawaii, Kansas, Maine, Maryland, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Oregon, Rhode Island, Utah, Vermont, and Washington.



## Advocacy Resource Center

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### State law chart: Naturopath licensure and scope of practice

Currently, 19 states and the District of Columbia have licensing or regulation laws for naturopaths. In these states, naturopathic doctors are required to graduate from an accredited four-year residential naturopathic medical school and pass a postdoctoral board examination (NPLEX) in order to receive a license. Licensed naturopathic physicians must fulfill state-mandated continuing education requirements annually, and will have a specific scope of practice defined by their state's law. The states that currently have licensing laws for naturopathic physicians are Alaska, Arizona, California, Colorado, Connecticut, Hawaii, Kansas, Maine, Maryland, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Oregon, Rhode Island, Utah, Vermont, and Washington.

State	Definition of Naturopathy	Rx Authority	Surgical Authority	Authority to Order Tests	Use of term “physician”
Alabama	Not licensed				
Alaska	The use of hydrotherapy, dietetics, electrotherapy, sanitation, suggestion, mechanical and manual manipulation for the stimulation of physiological and psychological action to establish a normal condition of mind and body; in this paragraph, "dietetics" includes herbal and homeopathic remedies. A.S. § 08.45.200	No. A person who practices naturopathy may not (1) give, prescribe, or recommend in the practice (A) a prescription drug, except as provided in (b) of this section; (B) a controlled substance; (C) a poison; (2) engage in surgery; (3) use the word "physician" in the person's title.  (b) Notwithstanding (a)(1)(A) of this section, a person who practices naturopathy may give, prescribe, or recommend in the practice a device or homeopathic remedy.  A.S. § 08.45.050	Prohibited. A.S. § 08.45.050.	Silent	No. Use of the term "physician" is expressly prohibited. A.S. § 45.08.45.050  See also disclosure/transparency requirements at A.S. § 12 AAC 42.900.
Arizona	A medical system of diagnosing and treating diseases,	Yes. A doctor of naturopathy	Silent	Silent	Yes. A.R.S. §32-1501.26.

	injuries, ailments, infirmities and other conditions of the human mind and body including by natural means, drugless methods, drugs, nonsurgical methods, devices, physical, electrical, hygienic and sanitary measures and all forms of physical agents and modalities. A.R.S. § 32-1501	may dispense a natural substance, drug, or device to a patient... A.R.S. § 32-1581  A "natural substance" is a homeopathic, botanical, or nutritional supplement that does not require a prescription by federal law before it is dispensed but is prescribed to treat a medical condition diagnosed by the doctor. A.R.S. § 32-1581(H)(3)			
<b>Arkansas</b>	Not licensed				
<b>California</b>	A noninvasive system of health practice that employs natural health modalities, substances, and education to promote health. Cal. Bus. & Prof. Code, Ch. 8.2 § 3640(d)	A naturopathic doctor may dispense, administer, order, and prescribe or perform the following: (1) Food, extracts of food, nutraceuticals, vitamins, amino acids, minerals, enzymes, botanicals and their extracts, botanical medicines, homeopathic medicines, all dietary supplements and nonprescription drugs as defined by the federal Food, Drug, and Cosmetic Act, consistent with the routes of administration identified in subdivision (d). (2) Hot or cold hydrotherapy; naturopathic physical medicine inclusive of the manual use of	(5) Repair and care incidental to superficial lacerations and abrasions, except suturing. (6) Removal of foreign bodies located in the superficial tissues. (d) A naturopathic doctor may utilize routes of administration that include oral, nasal, auricular, ocular, rectal, vaginal, transdermal, intradermal, subcutaneous, intravenous, and intramuscular.	A naturopathic doctor may order and perform physical and laboratory examinations for diagnostic purposes, including, but not limited to, phlebotomy, clinical laboratory tests, speculum examinations, orificial examinations, and physiological function tests. A naturopathic doctor may order diagnostic imaging studies, including X-ray, ultrasound, mammogram, bone densitometry, and others, consistent with naturopathic training as determined by the bureau, but shall refer the studies to an appropriately licensed health care professional to conduct the study and interpret the results.	No. Use of the term "physician" is prohibited. (Cal. Bus. & Prof. Code, Ch. 8.2 § 3661). "...shall not use any term or designation that would tend to indicate the practice of medicine, other than naturopathic medicine, unless otherwise licensed as a physician and surgeon, osteopathic doctor, or doctor of chiropractic." This section also contains disclosure requirements.  Naturopaths allowed to call themselves "naturopaths" "naturopathic practitioners" or "traditional naturopathic practitioners" (Cal BPC 3645), "naturopathic doctors," "doctor

		<p>massage, stretching, resistance, or joint play examination but exclusive of small amplitude movement at or beyond the end range of normal joint motion; electromagnetic energy; colon hydrotherapy; and therapeutic exercise. (3) Devices, including, but not limited to, therapeutic devices, barrier contraception, and durable medical equipment. Health education and health counseling. Repair and care incidental to superficial lacerations and abrasions, except suturing. (4) Health education and health counseling. Cal. Bus. &amp; Prof. Code, Ch. 8.2 § 3640 (c)</p>		<p>A licensee of the Committee may order and perform the following functions:  (1) Those functions expressly specified in subdivisions (a) and (c) of Section 3640 of the Code.  (2) The independent prescription and administration of epinephrine to treat anaphylaxis, as specified in Section 3640.7 of the Code.  (3) The independent prescription of natural and synthetic hormones, as specified in Section 3640.7 of the Code. § 4234. Naturopathic Medical Services Performable.</p>	<p>of naturopathic medicine,” “doctor of naturopathy,” or “naturopathic medical doctor” (Cal. BPC 3660).</p>
<p><b>Colorado (2013)</b></p>	<p>(12) (a) "Naturopathic medicine", as performed by a naturopathic doctor, means a system of health care for the prevention, diagnosis, evaluation, and treatment of injuries, diseases, and conditions of the human body through the use of education, nutrition, naturopathic preparations, natural medicines and other therapies, and other modalities that are designed to support or supplement the human body's own natural self-healing processes.  (b) "Naturopathic medicine" includes naturopathic physical medicine, which consists of naturopathic manual therapy, the therapeutic use of the physical agents of air, water, heat, cold, sound, light, touch, and electromagnetic nonionizing radiation, and the physical modalities of electrotherapy, diathermy, ultraviolet light, ultrasound, hydrotherapy, and exercise. (§ 12-37.3-101 (2013))</p>	<p>(c)(I) Dispensing, administering, ordering, and prescribing medicines listed in the naturopathic formulary, including (A) epinephrine to treat anaphylaxis; (B) barrier contraceptives, excluding intrauterine devices; (C) oxygen, but only for emergency use; (D) vitamins B6 and B12; (E) substances that are regulated by the FDA but that do not require a prescription order to be dispensed; and (F) vaccines from a manufacturer.</p>	<p>(2) A naturopathic doctor shall not:  (b) Perform surgical procedures, including surgical procedures using a laser device;  (c) Use general or spinal anesthetics, other than topical anesthetics;  (d) Administer ionizing radioactive substances for therapeutic purposes;  (8) "Minor office procedures" means:  (a) The repair, care, and suturing</p>	<p>The practice of naturopathic medicine by a naturopathic doctor includes: (b) the use of physical examinations and the ordering of clinical, laboratory, and radiological diagnostic procedures from licensed or certified health care facilities or laboratories for the purpose of diagnosing and evaluating and evaluating injuries, diseases, and conditions in the human body.</p>	<p>(3) A naturopathic doctor shall not use (a) the term “physician,” (b) the abbreviations “NMD” or “N.M.D.”; (c) the term “naturopathic medical doctor.”    A naturopathic doctor may use the title “naturopathic doctor,” “doctor of naturopathy,” or the initials “N.D.”    (H.B. 1111, 69th Leg., Reg. Sess. (Co. 2013)).</p>

	<p>(1) The practice of naturopathic medicine by a naturopathic doctor includes the following:</p> <p>(a) The prevention and treatment of human injury, disease, or conditions through education or dietary or nutritional advice, and the promotion of healthy ways of living;</p> <p>(b) The use of physical examinations and the ordering of clinical, laboratory, and radiological diagnostic procedures from licensed or certified health care facilities or laboratories for the purpose of diagnosing and evaluating injuries, diseases, and conditions in the human body;</p> <p>(c) Dispensing, administering, ordering, and prescribing medicines listed in the naturopathic formulary, including:</p> <p>(I) Epinephrine to treat anaphylaxis; and</p> <p>(II) Barrier contraceptives, excluding intrauterine devices; and</p> <p>(d) Performing minor office procedures.</p> <p>A naturopath shall <u>not</u>:</p> <p>(e) Treat a child who is less <b>than two years of age</b> unless the naturopathic doctor</p> <p>(I) provides to the parent or legal guardian of the child a copy of the most recent immunizations schedule recommended by the CDC advisory committee on immunization practices and recommends that the parent or legal guardian follow the immunizations schedule;</p> <p>(II)(A) On or after March 26, 2015, except as provided in sub-paragraph (B) of this subparagraph (II), demonstrates in each year in which the naturopathic doctor treats a child under two years of age, successful completion of five hours per year of education of practicum training solely related to pediatrics in accordance with continuing professional competency requirements; (B) If, pursuant to paragraph (f) of this subsection (2), a naturopathic doctor treats children</p>	<p>(2) A naturopathic doctor shall not:</p> <p>(a) Prescribe, dispense, administer, or inject a controlled substance or device identified in the federal "Controlled Substances Act", 21 U.S.C. sec. 801 et seq.; [...] (c) use general or spinal anesthetics, other than topical anesthetics; (d) administer ionizing radioactive substances for therapeutic purposes.</p>	<p>of superficial lacerations and abrasions;</p> <p>(b) The removal of foreign bodies located in superficial tissue, excluding the ear or eye; and</p> <p>(c) The use of antiseptics and local anesthetics in connection with a procedure described in paragraph (a) or (b) of this subsection (8).</p>		
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	<p>who are two years of age or older but less than eight years of age and successfully completes three hours per year of education or practicum training solely related to pediatrics, the naturopathic doctor is required only to successfully complete an additional 2 hours per year of education or practicum training solely related to pediatrics;</p> <p>(III)(A) develops and executes a written collaborative agreement with a physician who is a pediatrician or family physician; (B) provide to the director the name and license number of the physician.</p> <p>(IV) requires the child’s parent or legal guardian to sign an informed consent that (A) discloses that the naturopathic doctor is registered pursuant to this article; (B) discloses that the naturopathic doctor is not a physician; (C) recommends that the child have a relationship with a licensed pediatric health care provider; and (D) if the child has a relationship with a pediatric health care provider, requests permission from the parent or legal guardian for the naturopathic doctor to attempt to develop and maintain a collaborative relationship with the licensed pediatric health care provider, or if the child does not have a relationship with a licensed pediatric health care provider, refers the child to at least one pediatrician, physician, or APRN who cares for pediatric patients to provide a medical home for the child, with ongoing communication and relationship between the naturopathic doctor and the licensed pediatric health care provider, physician, or APRN; and</p> <p>(f) Treat a child who is <b>two years of age or older but less than eight years of age</b>, unless the naturopathic doctor:</p> <p>(I) provides to the parent or legal guardian a copy of the most recent immunizations schedule and recommends that the parent or legal guardian follow the immunizations</p>				
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	<p>schedule;</p> <p>(II) demonstrates successful completion of 3 hours per year of education or practicum training solely related to pediatrics;</p> <p>(III) requires the child’s parent or legal guardian to sign an informed consent that: (A) discloses the naturopathic doctor is registered pursuant to this article; (B) discloses that the naturopathic doctor is not a physician; (C) recommends that the child have a relationship with a licensed pediatric health care provider; and (D) if the child has a relationships with a licensed pediatric health care provider, requests permission from the parent or legal guardian for the naturopathic doctor to attempt to develop and maintain a collaborative relationship with the licensed pediatric health care provider.</p> <p>(g) Engage in or perform the practice of medicine, surgery, or any other form of healing except as authorized by this article;</p> <p>(h) Practice obstetrics;</p> <p>(i) Perform spinal adjustment, manipulation, or mobilization, but this paragraph (i) does not prohibit a naturopathic doctor from practicing naturopathic physical medicine as described in section 12-37.3-102(12)(b); or</p> <p>(j) Recommend the discontinuation of, or counsel against, a course of care, including a prescription drug that was recommended or prescribed by another health care practitioner licensed in this state, unless the naturopathic doctor consults with the health care practitioner who recommended the course of care.</p>				
Connecticut	The practice of natureopathy means the science, art and	No. "Natural substances" means	Silent	Silent	Unclear. Authority to use the



	practice of healing by natural methods as recognized by the Council of Natureopathic Medical Education and that comprises diagnosis, prevention and treatment of disease and health optimization by stimulation and support of the body's natural healing processes, as approved by the State Board of Natureopathic Examiners, with the consent of the Commissioner of Public Health, and shall include (1) counseling, (2) the practice of the mechanical and material sciences of healing as follows: The mechanical sciences such as mechanotherapy, articular manipulation, corrective and orthopedic gymnastics, physiotherapy, hydrotherapy, electrotherapy and phototherapy; and the material sciences such as nutrition, dietetics, phytotherapy, treatment by natural substances and external applications; (3) ordering diagnostic tests and other diagnostic procedures as such tests and procedures relate to the practice of mechanical and material sciences of healing as described in subdivision (2) of this subsection; (4) ordering medical devices and durable medical equipment; and (5) removing ear wax, spirometry, tuberculosis testing and venipuncture for blood testing. Conn. Ann. Stat. § 20-34	substances that are not narcotic substances, do not require the written or oral prescription of a licensed practitioner to be dispensed and are only administered orally.			term is neither expressly granted nor prohibited. The term "natureopathic physician" is used in state statute (373 § 20-37b) . The term is used in the official posted minutes of the Connecticut Board of Natureopathic Examiners.
<b>Delaware</b>	Not licensed				
<b>District of Columbia</b>	A system of health care that utilizes education, natural medicines, and natural therapies to support and stimulate a patient's intrinsic self-healing processes to prevent, diagnose, and treat human conditions and injuries. Does not include the practices of physical therapy, physical rehabilitation, acupuncture, or chiropractic. Administer or provide for preventive and therapeutic purposes natural medicines by their appropriate route of administration, natural therapies, topical medicines, counseling, hypnotherapy, dietary therapy, naturopathic physical medicine, therapeutic devices, and barrier devices for contraception. For the purposes of this paragraph, the term "naturopathic physical medicine" means the use of the physical agents of air, water, heat, cold,	No. An individual licensed to practice naturopathic medicine shall not prescribe, dispense, or administer any controlled substances, except those natural medicines authorized by this chapter . <b>“Naturally occurring substances”</b> means food, natural vitamins and minerals, herbs and herbal preparations, roots, barks, homeopathic	An individual licensed to practice naturopathic medicine under this chapter shall not: Perform surgical procedures, except for minor office procedures, as defined by rule; Use for therapeutic purposes, any device regulated by the United States Food and Drug Administration ("FDA") that has not been approved by the FDA.  Regs. § 17-5003.4 It shall be	Silent	No. Practitioners of naturopathy or naturopathic healing may use the title "Doctor of Naturopathy." (DC Municipal Regulations, Title 14, Ch. 50, 5003.1)

	<p>sound, and light, and the physical modalities of electrotherapy, biofeedback, diathermy, ultraviolet light, ultrasound, hydrotherapy, and exercise, and includes naturopathic manipulation and mobilization therapy; and review and interpret the results of diagnostic procedures commonly used by physicians in general practice, including physical and official examinations, electrocardiograms, diagnostic imaging techniques, phlebotomy, clinical laboratory tests and examinations, and physiological function tests. DCCA § 3-1201.02, § 3-1206.21, Code of D.C. Regs. § 17-5003</p>	<p>preparations, plant substances and natural medicines of animal, mineral or botanical origin which do not require a prescription unless from a homeopathic pharmacy.</p> <p>“Counseling individuals and treatment through the use of naturally occurring substances” includes, but is not limited to, giving advice, ordering or prescribing naturally occurring substances, and the use of physical modalities, and other treatments, commonly provided by naturopaths and not otherwise prohibited under the Act. Code of D.C. Regs. § 17-5099.1</p>	<p>unlawful for a naturopath practicing in the District of Columbia to:</p> <p>(a) Falsely lead any person to believe he or she practices medicine as defined in the Act.</p> <p>(b) Use x-rays, perform surgical procedures, inject any substance into another person by needle, or perform any invasive procedure on another person;</p>		
<b>Florida</b>	Not licensed				
<b>Georgia</b>	Not licensed				
<b>Hawaii</b>	<p>The practice of the art and science of diagnosis, prevention, and treatment of disorders of the body by support, stimulation, or both, of the natural processes of the human body. The practice of naturopathic medicine includes the prescription, administration, dispensing, and use of nutrition and food science, physical modalities, manual manipulation, parental therapy, minor office procedures, naturopathic formulary, hygiene and immunization, contraceptive devices, common diagnostic procedures, and behavioral medicine of the type taught in education and training at naturopathic medical colleges; provided that the use of parenteral therapy</p>	<p>No. The practice of naturopathy excludes prescribing, dispensing, or using prescription drugs except as provided for in the definition of natural medicine.</p>	<p>The practice of naturopathy excludes surgery and the application of x-rays.</p> <p>Authorization to perform minor office procedures required. §16-88-70</p> <p>"Minor office procedure" means care and procedures relative to superficial lacerations, lesions, and abrasions, and the removal</p>	Silent	Yes

	and performance of minor office procedures shall not be allowed until the board adopts rules in accordance with chapter 91 pursuant to section 455-6. Haw. Rev. Stat. §455-1		of foreign bodies located in superficial structures not including the eye; and the topical and parenteral use of substances consistent with the practice of naturopathic medicine, in accordance with rules established by the board.		
<b>Idaho</b>		Chapter 51, Title 54, Idaho Code, Relating to Licensure of Naturopathic Physicians; and Providing Application to Certain Licenses. REPEALED by Senate Bill No. 1177.  Section 2. That all licenses issued under Chapter 51, Title 54, Idaho Code, as repealed by Section 1 of this act, are deemed to have expired for nonpayment of license fees and further are hereby declared to be null and void.			
<b>Illinois</b>	Not licensed				
<b>Indiana</b>	Not licensed				
<b>Iowa</b>	Not licensed				
<b>Kansas</b>	A system of health care practiced by naturopathic doctors for the prevention, diagnosis and treatment of human health conditions, injuries and diseases, that uses education, natural medicines and therapies to support and stimulate the individual's intrinsic self-healing processes, and includes prescribing, recommending or administering: (1) Food, food extracts, vitamins, minerals, enzymes, whole gland thyroid,	Yes. Only those medicines approved by the Board on the Naturopathic Formulary and pursuant to a written protocol with a physician. K.A.R. § 100-72-8	A naturopathic doctor may not perform surgery, obstetrics, administer ionizing radiation, or prescribe, dispense or administer any controlled substances as defined in K.S.A. 65-4101, and amendments thereto, or any	Silent	No. "Physician" means a person licensed to practice medicine and surgery. K.S.A. §65-7272(10).

	botanicals, homeopathic preparations, nonprescription drugs, plant substances that are not designated as prescription drugs or controlled substances, topical drugs as defined in subsection (i) of this section, and amendments thereto; (2) health care counseling, nutritional counseling and dietary therapy, naturopathic physical applications, barrier contraceptive devices; (3) substances on the naturopathic formulary which are authorized for intramuscular or intravenous administration pursuant to a written protocol entered into with a physician who has entered into a written protocol with a naturopathic doctor licensed under this act; (4) noninvasive physical examinations, venipuncture to obtain blood for clinical laboratory tests and oroficial examinations, excluding endoscopies; (5) minor office procedures; and (6) naturopathic acupuncture		prescription-only drugs except those listed on the naturopathic formulary adopted by the board pursuant to this act.”  May perform “noninvasive physical examinations, venipuncture to obtain blood for clinical laboratory tests and orificial examinations, excluding endoscopies; (E) minor office procedures; and (F) naturopathic acupuncture. K.A.R. § 65-7202 (f)		
<b>Kentucky</b>	Not licensed				
<b>Louisiana</b>	Not licensed				
<b>Maine</b>	"Naturopathic medicine" means a system of health care for the prevention, diagnosis and treatment of human health conditions, injuries and diseases that uses education, natural medicines and therapies to support and stimulate the individual's intrinsic self-healing processes. M.R.S.A. Tit. 32, §12522(11)	Yes. A naturopathic doctor may not prescribe, dispense, or administer any substance or device identified in Schedule I, II, III, IV, or V as described in the federal Controlled Substances Act; M.R.S.A. Tit. 32, §12522(4)(A)  A naturopathic doctor may prescribe nonprescription medications without limitation; and may only prescribe non-controlled legend drugs from the following categories: homeopathic remedies, vitamins and minerals, hormones, local anesthesia, and immunizations	Yes. A naturopathic doctor may not “(b) Perform surgical procedures except those office procedures authorized by this chapter; Practice emergency medicine except when a good Samaritan rendering gratuitous services in the case of emergency and except for the care of minor injuries; or Practice or claim to practice medicine and surgery, osteopathy, dentistry, podiatry, optometry, chiropractic, physical therapy or any other system or method of treatment not authorized in this chapter. M.R.S.A. Tit. 32, §12522(5)	A naturopathic doctor may use physical examinations for diagnostic purposes including phlebotomy, clinical laboratory tests, speculum examinations and physiological function tests, excluding all endoscopies and physiological function tests requiring infusion, injection, inhalation or ingestion of medications to perform tests. A naturopathic doctor may order ultrasound, x-ray and electrocardiogram tests but must refer to an appropriate licensed health care professional for conducting and interpreting the tests.	No. Use of the title "physician" by naturopathic licensees is prohibited. M.R.S.A. Tit. 32, Ch. 113-B, §12521(2).

		<p>that are designated by a subcommittee of the board which shall consist of naturopathic members, a pharmacist member, and an allopathic or osteopathic member. M.R.S.A. § 12522(5)</p> <p>Prior to independently prescribing non-controlled legend drugs, a naturopathic doctor shall establish and complete a 12-month collaborative relationship with a licensed allopathic or osteopathic physician to review the naturopathic doctor's prescribing practices. M.R.S.A. Tit. 32, §12522(4)(C)</p> <p>Naturopathic doctors may also prescribe medications, including natural antibiotics and topical medicines, within the limitations set forth in subsection 4.</p>		<p>A naturopathic doctor may prescribe therapeutic devices or use noninvasive diagnostic procedures commonly used by allopathic or osteopathic physicians in general practice.</p>	
<b>Maryland (2014)</b>	<p>“Naturopathic medicine” means the prevention, diagnosis, and treatment of human health conditions, injury, and disease using only patient education and naturopathic therapies and therapeutic substances recognized by the Council of Naturopathic Medical Education (CNME). Naturopathic medicine includes:</p>	<p>The Naturopathic Doctors Formulary Council includes the Deputy Secretary of Public Health Services, 2 certified naturopaths with 2 years’ experience, 2 physicians, 1</p>	<p>Prohibited.</p>	<p>Naturopaths can order and perform physical and laboratory exams for diagnostic purposes, including phlebotomy, clinical lab tests, orificial examinations, electrocardiograms with</p>	<p>Prohibited.</p>

	<ul style="list-style-type: none"><li>• Counseling;</li><li>• In the practice of the mechanical sciences of healing, including mechanotherapy, articular manipulation, corrective and orthopedic gymnastics, hydrotherapy, electrotherapy, and phototherapy; and</li><li>• The practice of the material sciences of healing, including nutrition, phytotherapy, treatment by natural substances, and external applications; and</li><li>• Prescribing, dispensing, or administering nonprescription and prescription drugs and decides listed in the formulary.</li></ul> <p>Naturopaths can:</p> <ul style="list-style-type: none"><li>• Dispense or order natural medicines<sup>1</sup>, and administer them only transdermally<sup>2</sup>;</li><li>• Administer hydrotherapy and therapeutic exercise;</li><li>• Provide health education and counseling;</li><li>• Perform naturopathic musculoskeletal mobilization;</li><li>• Order and perform physical and laboratory exams for diagnostic purposes, including phlebotomy, clinical lab tests, orificial examinations, electrocardiograms with overread by a cardiologist, and physiological function tests; and</li><li>• Order diagnostic imaging studies and interpret the reports of those studies.</li></ul> <p>A license does not authorize a Naturopath to:</p>	<p>pharmacist, and 1 consumer.</p> <p>The council is tasked with recommending to the Board of Medicine a formulary. The board may modify or reject the formulary.</p> <p>The formulary shall include</p> <ul style="list-style-type: none"><li>• Nonprescription drugs and devices</li><li>• Prescription oxygen and auto-injectable epinephrine</li><li>• Prescription diaphragms and cervical caps for contraception</li></ul> <p>The formulary may not include</p> <ul style="list-style-type: none"><li>• Prescription drugs or devices</li><li>• Controlled substances</li></ul>		<p>overread by a cardiologist, and physiological function tests; and can order diagnostic imaging studies and interpret the reports of those studies.</p>	
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<sup>1</sup> Natural medicines of mineral, animal, or botanical origin, including food, extracts of food, nutraceuticals, vitamins, amino acids, minerals, enzymes, botanicals and their extracts, botanical medicins, homeopathic medicines, and all other dietary supplements and nonprescription drugs as defined by the FDCA that use routes of administration including oral, nasal, auricular, ocular, rectal, vaginal, transdermal, and intramuscular.

<sup>2</sup> The final version of H.B. 402 struck all of the following areas from the scope originally proposed: Administering natural medicines via ocular, rectal, vaginal, intramuscular, intradermal, subcutaneous and intravenous routes, dispensing and ordering devices, and performing minor office procedures.

	<ul style="list-style-type: none"> <li>• Prescribe, dispense, or administer any prescription drug;</li> <li>• Perform surgical procedures;</li> <li>• Practice or claim to practice as a medical doctor or physician, an osteopath, a dentist, a podiatrist, an optometrist, a psychologist, a nurse practitioner, a physician assistant, a chiropractor, a physical therapist, an acupuncturist, or any other health care professional;</li> <li>• Use general or spinal anesthetics;</li> <li>• Administer ionizing radioactive substances for therapeutic purposes;</li> <li>• Perform chiropractic adjustments or manipulations that include high-velocity thrusts at or beyond the end range of normal joint motion unless the licensee is also a licensed chiropractor; or</li> <li>• Perform acupuncture unless the licensee is also a licensed acupuncturist.</li> </ul>				
<b>Massachusetts (2017)</b>	<p>“Naturopathic health care”, a system of health care practices for the prevention, evaluation and treatment of illnesses, injuries and conditions of the human body through the use of education, nutrition, natural medicines and therapies and other modalities which are designed to support, stimulate or supplement the human body’s own natural self-healing processes.</p> <p>“Naturopathic manipulative therapy”, the manually-administered mechanical treatment of body structures or tissues in accordance with naturopathic principles to restore the normal physiological function of the human body.</p> <p>“Naturopathic physical medicine”, the therapeutic use of the physical agents of air, water, heat, cold, sound, light and the physical modalities of electrotherapy, diathermy, ultraviolet light, hydrotherapy, naturopathic manipulative therapy and therapeutic exercise.</p>	<p>The practice of naturopathic health care shall include dispensing, administering, ordering and prescribing natural medicines of mineral, animal or botanical origin, including food products or extracts, vitamins, minerals, enzymes, digestive aids, natural hormones, plant substances, homeopathic preparations, natural antibiotics, topical medicines and nonprescription drugs, therapeutic devices and barrier contraceptives to prevent or treat illnesses, injuries and conditions of the human body.</p>	<p>The practice of naturopathic health care shall include the use of <u>non-invasive physical examinations</u> and the ordering of clinical and laboratory procedures from licensed clinics or laboratories to evaluate injuries, illnesses and conditions in the human body; the use of manual mechanical manipulation of body structures or tissues, in accordance with naturopathic principles.</p> <p>The practice of naturopathic health care <u>shall not include</u> performing surgery or invasive procedures or examinations,</p>	<p>The practice of naturopathic health care shall include, the use of non-invasive physical examinations and the <u>ordering of clinical and laboratory procedures from licensed clinics or laboratories</u> to evaluate injuries, illnesses and conditions in the human body.</p>	<p>“Naturopathic doctor”, a person who is licensed by the board to practice naturopathic health care pursuant to this chapter.</p>



		The practice of naturopathic health care <u>shall not include</u> prescribing, dispensing or administering a drug classified as a controlled substance or prescription drug under chapter 94C.	abortions or the use of radiation, radioactive substances or local, general or spinal anesthesia; the practice of acupuncture and traditional chinese medicine.		
Michigan	Not licensed				
Minnesota	Naturopathic medicine "means a system of primary health care for the prevention, assessment, and treatment of human health conditions, injuries, and diseases that uses: services, procedures, and treatments as described in section 147E.05; and (2) natural health procedures and treatments in section 146A.01, subdivision 4.  Minn. Stat. § 147E.01(10)	Subdivision 1. Practice parameters. (a) The practice of naturopathic medicine includes, but is not limited to, the following services: (1) ordering, administering, prescribing, or dispensing for preventive and therapeutic purposes: food, extracts of food, nutraceuticals, vitamins, minerals, amino acids, enzymes, botanicals and their extracts, botanical medicines, herbal remedies, homeopathic medicines, dietary supplements and nonprescription drugs as defined by the Federal Food, Drug, and Cosmetic Act, glandulars, protomorphogens, lifestyle counseling, hypnotherapy, biofeedback, dietary therapy, electrotherapy, galvanic therapy, oxygen, therapeutic devices, barrier devices for contraception, and minor office procedures,	(b) A naturopathic doctor registered under this chapter shall not perform surgical procedures using a laser device or perform surgical procedures beyond superficial tissue. Minn. Stat. § 147E.05 (2)(b)	(2) Performing or ordering physical examinations and physiological function tests; (3) ordering clinical laboratory tests and performing waived tests as defined by the United States Food and Drug Administration Clinical Laboratory Improvement Amendments of 1988 (CLIA); (4) referring a patient for diagnostic imaging including x-ray, CT scan, MRI, ultrasound, mammogram, and bone densitometry to an appropriately licensed health care professional to conduct the test and interpret the results; (5) prescribing nonprescription medications and therapeutic devices or ordering noninvasive diagnostic procedures commonly used by physicians in general practice; and	

		including obtaining specimens to assess and treat disease; Minn. Stat. § 147E.05 (1)  Homeopathic preparations. "Homeopathic preparations" means medicines prepared according to the Homeopathic Pharmacopoeia of the United States. Minn. Stat. § 147E.01(6)			
<b>Mississippi</b>	Not licensed				
<b>Missouri</b>	Not licensed				
<b>Montana</b>	"Naturopathic medicine", "naturopathic health care", or "naturopathy" means a system of primary health care practiced by naturopathic physicians for the prevention, diagnosis, and treatment of human health conditions, injury, and disease. Its purpose is to promote or restore health by the support and stimulation of the individual's inherent self-healing processes. This is accomplished through education of the patient by a naturopathic physician and through the use of natural therapies and therapeutic substances. M.C.A. 37-26-103(7)	Yes. A naturopathic physician may not prescribe, dispense, or administer any legend drug [as defined in 50-31-301], except for whole gland thyroid; homeopathic preparations; and natural substances, drugs, and therapies described in subsection (2), which includes food, food extracts, vitamins, minerals, enzymes, whole gland thyroid, botanical medicines, homeopathic preparations, and oxytocin (pitocin). M.C.A. § 37-26-301	A naturopathic physician may not: perform surgical procedures except those minor surgery procedures authorized by this chapter. M.C.A. § 37-26-301  (a) "Minor surgery" means the use of: (i) operative, electrical, or other methods for the surgical repair and care incidental to superficial lacerations and abrasions, superficial lesions, and the removal of foreign bodies located in the superficial tissues; and (ii) antiseptics and local anesthetics in connection with the methods. (b) Minor surgery does not include general or spinal anesthetics, major surgery, surgery of the body	Naturopathic physicians may perform or order for diagnostic purposes a physical or orificial examination, ultrasound, phlebotomy, clinical laboratory test or examination, physiological function test, and any other noninvasive diagnostic procedure commonly used by physicians in general practice and as authorized by 37-26-201(2). M.C.A § 37-26-101 (4)	Yes. M.C.A. § 37-26-103(9).

			cavities, or specialized surgeries, such as plastic surgery, surgery involving the eyes, or surgery involving tendons, ligaments, nerves, or blood vessels. M.C.A. § 37-26-103(5)		
<b>Nebraska</b>	Not licensed				
<b>Nevada</b>	Not licensed				
<b>New Hampshire</b>	Naturopathic medicine is a system of primary health care for the prevention, diagnosis, and treatment of human health conditions, injuries, and diseases using education, natural medicines and therapies to support and stimulate the individual's intrinsic self-healing processes. Doctors of naturopathic medicine are authorized to use, for preventive and therapeutic purposes, natural medicines and therapies, counseling, hypnotherapy, biofeedback, dietary therapy, naturopathic physical medicine, therapeutic devices, and barrier devices for contraception. Naturopathic physical medicine is the therapeutic use of the physical agents of air, water, heat, cold, sound, light, and electromagnetic non-ionizing radiation and the physical modalities of electrotherapy, diathermy, ultraviolet light, ultrasound, hydrotherapy, naturopathic manipulative therapy, and therapeutic exercise.	<p>Yes. Doctors of naturopathic medicine shall not prescribe, dispense, or administer any legend or controlled substances, except those natural medicines as authorized by this chapter. N.H.R.S.A. § 328-E:4(V)</p> <p>Doctors of naturopathic medicine with specialty certification in naturopathic childbirth, shall be authorized to use oxytocin and pitocin. N.H.R.S.A. § 328-E:4(V)</p>	Doctors of naturopathic medicine are not authorized to perform surgical procedures, practice emergency medicine, except as a good samaritan rendering gratuitous services in the case of emergency and except for the care of minor injuries, practice or claim to practice medicine and surgery, osteopathy, dentistry, podiatry, optometry, chiropractic, physical therapy, or any other system or method of treatment not authorized in this chapter. N.H.R.S.A. § 328-E:4 VI.	<p>N.H.R.S.A. § 328-E:4 III. Doctors of naturopathic medicine may prescribe nonprescription medications and therapeutic devices or use noninvasive diagnostic procedures commonly used by medical practitioners in general practice.</p> <p>Doctors of naturopathic medicine may use, for diagnostic purposes physical and orificial examinations, X-rays, electrocardiograms, ultrasound, phlebotomy, clinical laboratory tests and examinations, and physiological function tests. N.H.R.S.A. § 328-E:2, N.H.R.S.A. § 328-E:4</p>	Likely not. Naturopathic licensees shall use the title ""doctor of naturopathic medicine" and the recognized abbreviation N.H.R.S.A. § 328-E:3.
<b>New Jersey</b>	Not licensed				
<b>New Mexico</b>	Not licensed				
<b>New York</b>	Not licensed				
<b>North Carolina</b>	Not licensed				

<b>North Dakota</b>	"Naturopath" means an individual licensed to practice naturopathic health care under this chapter. Chapter 43-58.	<p>A naturopath may not prescribe, dispense, or administer any prescription drug or administer ionizing radioactive substances for therapeutic purposes.</p> <p>A naturopath may prescribe and administer for preventive and therapeutic purposes a prescriptive device and the following nonprescriptive natural therapeutic substances, drugs, and therapies:</p> <ul style="list-style-type: none"> <li>a. Food, vitamins, minerals, dietary supplements, enzymes, botanical medicines, and homeopathic preparations;</li> <li>b. Topical drugs, health care counseling, nutritional counseling and dietary therapy, naturopathic physical applications, and therapeutic devices; and</li> <li>c. Barrier devices for contraception.</li> </ul>	Naturopaths are prohibited from performing surgical procedures.	A naturopath may perform or order for diagnostic purposes a physical or orificial examination, ultrasound, phlebotomy, clinical laboratory test or examination, physiological function test, and any other noninvasive diagnostic procedure commonly used by physicians in general practice and as authorized by the board.	Prohibited. A naturopath may use the title "naturopath" or "doctor of naturopathic medicine" and the abbreviation "N.D." when used to reflect either of these titles.
<b>Ohio</b>	Not licensed				
<b>Oklahoma</b>	Not licensed				
<b>Oregon</b>	Naturopathic medicine is the discipline that uses physiotherapy, natural healing processes and minor surgery and has as its objective the maintaining of the body in, or of restoring it to, a state of normal health. O.R.S. § 685.010, 685.030, 685.145, 689.635	Yes. Licensees may perform health maintenance and restoration measures consistent with generally recognized and accepted principles of naturopathic medicine, including but not limited to (a) administering, dispensing or	O.R.S. § 685.010 (3) "Minor surgery" means the use of electrical or other methods for the surgical repair and care incident thereto of superficial lacerations and abrasions, benign superficial lesions, and the removal of foreign bodies	Silent	Yes. Only licensees under this chapter may use any or all of the following terms, consistent with academic degrees earned: "Doctor of Naturopathy" or its abbreviation, "N.D.," "Naturopath" or "Naturopathic Physician." However, none of

		writing prescriptions for drugs; (b) recommending the use of specific and appropriate over-the-counter pharmaceuticals; (c) administering anesthetics or antiseptics in connection with minor surgery as defined in ORS 685.010; (d) ordering diagnostic tests; (e) using radiopaque substances administered by mouth or rectum necessary for Roentgen diagnostic purposes; (f) administering substances by penetration of the skin or mucous membrane of the human body for diagnostic, preventative or therapeutic purposes. The Board of Naturopathic Examiners may adopt by rule appropriate procedures for administering substances under this paragraph. (O.R.S. § 685.030)	located in the superficial structures; and the use of antiseptics and local anesthetics in connection therewith.		these terms, or any combination of them, shall be so used as to convey the idea that the physician who uses them practices anything other than naturopathic medicine. O.R.S. §685.020
<b>Pennsylvania</b>	Not licensed				
<b>Rhode Island (2017)</b>	"Naturopathic health care" or "the practice of naturopathic health care" means a system of health care that utilizes education, natural substances and natural therapies to support and stimulate a patient's intrinsic self-healing processes and to prevent, and treat human health conditions and injuries. RI Gen. Laws 5-36.1-2(8)	(a) A license authorizes a licensee to: (2) Dispense or order natural substances of mineral, animal, or botanical origin, including food, extracts of food, nutraceuticals, vitamins, amino acids, minerals, enzymes, botanicals and their extracts, botanical substances, homeopathic substances, and all	A person licensed under this chapter shall <u>not</u> perform any of the following acts: (3) Perform surgical procedures; (7) Perform chiropractic adjustments or manipulations that include high-velocity thrusts at or beyond the end range of normal joint motion unless the licensee is also a licensed chiropractor;	(a) A license authorizes a licensee to (1) Order and perform physical and laboratory examinations for diagnostic purposes;	May use the title "doctor of naturopathy" but may not claim to practice as a medical doctor or physician, a doctor of osteopathic medicine, a primary care doctor, a primary care practitioner, a primary care provider, a primary care naturopath, a dentist, a podiatrist, an optometrist, a psychologist, an ANR, a PA, a

		<p>dietary supplements and nonprescription drugs as defined by the FDCA that use various routes of administration, including oral, nasal, auricular, ocular, rectal, vaginal, transdermal;</p> <p>(3) Administer natural substances of mineral, animal, or botanical origin, including food, extracts of food, nutraceuticals, vitamins, amino acids, minerals, enzymes, botanicals and their extracts, botanical substances, homeopathic substances, and all dietary supplements and nonprescription drugs as defined by the FDCA using transdermal routes of administration;</p> <p>(4) Administer or perform hot or cold hydrotherapy, electromagnetic energy, and therapeutic exercise for the purpose of providing basic therapeutic care services, except that if a referral to another licensed provider is appropriate for ongoing rehabilitation or habilitation services, the doctor of naturopathy shall make the referral;</p> <p>A person licensed under this chapter shall <u>not</u> perform any of</p>	<p>(8) Perform acupuncture unless the licensee is also a licensed acupuncturist;</p>		<p>chiropractor, a physical therapist, an acupuncturist, or any other health care professional.</p>
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		the following acts: (1) Prescribe, dispense, or administer any legend medications or substances controlled pursuant to the federal Controlled Substances Act 21 U.S.C. §812 and chapter 28 of title 21; (2) Use for therapeutic purposes, any device regulated by the United States Food and Drug Administration (FDA) that has not been approved by the FDA; (5) Use general regional or spinal anesthetics or procedural sedation; (6) Administer ionizing radioactive substances for therapeutic or diagnostic purposes; (9) Advise patients regarding prescription drugs beyond possible dietary supplement/herb - prescription drug interactions;			
South Carolina	Not licensed. State law explicitly prohibits the practice of naturopathy. S.C. Code Ann § 40-31-10	N/A	N/A	N/A	N/A
South Dakota	Not licensed				
Tennessee	It is unlawful for any person to practice naturopathy in this state. Tenn. Code Ann. § 63-6-205(A)  The term “naturopathy” <i>does not</i> mean the sale of herbs or natural health information exchanges provides as a service so long as: (A) The sale or provision of information exchanges is not conducted for the purpose of the prevention, diagnosis or treatment of any physical ailment or physical injury to or	N/A	N/A	N/A	N/A



	<p>deformity of another; and (B) In any instance involving natural health information exchanges, the seller obtains a signed acknowledgement from the buyer that the seller is neither a licensed practitioner of the healing arts in Tennessee, nor meets the recognized qualification criteria which would allow the provision of any form of diagnosis, treatment recommendation, or medical care in Tennessee. For the purposes of meeting the requirements of this section, the seller shall keep the signed acknowledgement from the buyer on file for a period of three (3) years. (Repealed at midnight, June 30, 2012.)</p>				
<b>Texas</b>	Not licensed				
<b>Utah</b>	<p>Naturopathic medicine is a system of primary health care for the prevention, diagnosis, and treatment of human health conditions, injuries, and diseases using education, natural medicines and therapies to support and stimulate the individual's intrinsic self-healing processes by using naturopathic childbirth (if specified requirements are met), naturopathic mobilization therapy, physical medicine, minor office procedures, prescribing or administering natural medicine, prescribing medical equipment and devices, diagnosing by using medical equipment and devices, and administering therapy or treatment by the use of medical devices, prescribing barrier devices for contraception, dietary therapy, taking and using diagnostic x-rays, electrocardiograms, ultrasound, and physiological function tests, taking body fluids for clinical laboratory tests and using the results in diagnosis, taking a history from and conducting a physical examination upon a human patient and prescribing and administering natural medicines and medical devices. U.C.A. § 58-71-102</p>	<p>Yes. Natural medicines are food, food extracts, dietary supplements, all homeopathic remedies, and plant substances <i>not designated as prescription drugs or controlled substances</i>; over the counter medications; other nonprescription substances (<i>the prescription or administration of which is not restricted under federal or state law</i>); and prescription drugs that <i>are not controlled substances</i> as defined in [58-37-2], the prescription of which is consistent with the competent practice of naturopathic medicine, and the prescription of which is approved by the Naturopathic Formulary Advisory Peer committee. The Naturopathic Formulary can be</p>	<p>"Minor office procedures" means:</p> <ul style="list-style-type: none"> <li>(i) the use of operative, electrical, or other methods for repair and care of superficial lacerations, abrasions, and benign lesions;</li> <li>(ii) removal of foreign bodies located in the superficial tissues, excluding the eye or ear; and</li> <li>(iii) the use of antiseptics and local anesthetics in connection with minor office surgical procedures.</li> </ul> <p>(b) "Minor office procedures" does not include:</p> <ul style="list-style-type: none"> <li>(i) general or spinal anesthesia;</li> <li>(ii) office procedures more complicated or extensive than those set forth in Subsection (7)(a);</li> </ul>	<p>Yes. Practice of naturopathic medicine" means:</p> <ul style="list-style-type: none"> <li>(a) a system of primary health care for the prevention, diagnosis, and treatment of human health conditions, injuries, and diseases that uses education, natural medicines, and natural therapies, to support and stimulate the patient's intrinsic self-healing processes;</li> <li>(vi) prescribing medical equipment and devices, diagnosing by the use of medical equipment and devices, and administering therapy or treatment by the use of medical devices necessary and consistent with the competent practice of naturopathic medicine; U.C.A. § 58-71-102(12)(A)(vi)</li> </ul>	<p>Yes. Naturopathic licensees can use the designation "naturopathic physician," "naturopathic doctor," "naturopath," "doctor of naturopathic medicine," "doctor of naturopathy," "naturopathic medical doctor," "naturopathic medicine," "naturopathic health care," "naturopathy," "N.D.," "N.M.D." U.C.A. § 58-71-102.</p>

		found at U.C.A. § R156-71-202. U.C.A. § 58-71-102	(iii) procedures involving the eye; or (iv) any office procedure involving tendons, nerves, veins, or arteries. U.C.A. § 58-71-102 (7) (a)		
Vermont	Naturopathic medicine is a system of health care that utilizes education, natural medicines and natural therapies to support and stimulate a patient's intrinsic self-healing processes to prevent, diagnose and treat human health conditions and injuries. This includes administering or providing, for preventative and therapeutic purposes, nonprescription medicines, topical medicines, botanical medicines, homeopathic medicines, counseling, hypnotherapy, nutritional and dietary therapy, naturopathic physical medicine, naturopathic childbirth, therapeutic devices, barrier devices for contraception, and using diagnostic procedures such as physical and orificial examinations, electrocardiograms, diagnostic imaging techniques, phlebotomy, clinical laboratory tests and examinations, and physiological function tests. Naturopathic physical medicine is the use of the physical agents of air, water, heat, cold, sight, sound and light, ultrasound, hydrotherapy and exercise. <i>Naturopathic medicine does not include physical therapy, physical rehabilitation or chiropractic.</i> V.S.A. § 4121, V.C.R. § 04-030-380.-3.7	<p>Yes. An individual [licensed as a naturopathic physician] may administer or provide for preventative and therapeutic purposes nonprescription medicines, topical medicines, botanical medicines, homeopathic medicines, counseling, hypnotherapy, nutritional and dietary therapy, naturopathic physical medicine, naturopathic childbirth, therapeutic devices, barrier devices for contraception, and prescription medicine authorized by this chapter or by the formulary. The formulary can be found at Vermont Rules 13-140-061. V.S.A. § 4121</p> <p>A person licensed under this chapter shall not perform any of the following acts: (1) Prescribe, dispense, or administer any prescription medicines without obtaining from the director the special license endorsement under subsection 4125(d) of this</p>	No person shall perform the following acts “(2) Perform surgical procedures, except for episiotomy and perineal repair associated with naturopathic childbirth.” V.S.A. § 4122(b)(2)	Licensed Naturopath may “(B) Use diagnostic procedures commonly used by physicians in general practice, including physical and orificial examinations, electrocardiograms, diagnostic imaging techniques, phlebotomy, clinical laboratory tests and examinations, and physiological function tests.” V.S.A. § 4121(8)(b)	Yes. V.S.A. §26-81-4121(10).

		<p>chapter. V.S.A. § 4122(b)</p> <p>(d) The director shall adopt rules which shall authorize a naturopathic physician to prescribe, dispense, and administer prescription medicines. These rules shall require a naturopathic physician to pass a naturopathic pharmacology examination ...that shall test an applicant's knowledge of the pharmacology, clinical use, side effects, and drug interactions of prescription medicines. V.S.A. § 4125(d).</p> <p>The director shall waive the examination requirement if the applicant is a naturopathic physician regulated under the laws of another jurisdiction who is in good standing to practice naturopathic medicine in that jurisdiction and, in the opinion of the director, the standards and qualifications required for regulation in that jurisdiction are at least equal to those required by this chapter. V.S.A. § 4129.</p>			
Virginia	Not licensed				
Washington	Naturopathic medicine is the practice by naturopaths of the art and science of the diagnosis, prevention, and treatment of disorders of the body by stimulation or support, or both, of	Yes. "Naturopathic medicines" means vitamins, minerals, botanical medicines,	Yes. "Minor office procedures" means care and procedures incident thereto of superficial	Silent	Most likely/unclear. Statutory headings refer to "naturopathic physicians" but express

	the natural processes of the human body. A naturopath is responsible and accountable to the consumer for the quality of naturopathic care rendered. The practice of naturopathic medicine includes manual manipulation (mechanotherapy), the prescription, administration, dispensing, and use, except for the treatment of malignancies, of nutrition and food science, physical modalities, minor office procedures, homeopathy, naturopathic medicines, hygiene and immunization, contraceptive devices, common diagnostic procedures, and suggestion; however, nothing in this chapter shall prohibit consultation and treatment of a patient in concert with a practitioner licensed under chapter 18.57 or 18.71 R.C.W. ( <i>osteopathic medicine provisions</i> ) . No person licensed under this chapter may employ the term "chiropractic" to describe any services provided by a naturopath. R.C.W. § 18.36A.040	homeopathic medicines, hormones, and those legend drugs and controlled substances consistent with naturopathic medical practice in accordance with rules established by the Secretary. <i>Controlled substances are limited to codeine and testosterone products that are contained in Schedules III, IV, and V in Chapter 69.50 RCW.</i> A Legend Substance List is currently being updated. R.C.W. § 18.36A.020 and A.040	lacerations, lesions, and abrasions, and the removal of foreign bodies located in superficial structures, not to include the eye; and the use of antiseptics and topical or local anesthetics in connection therewith. "Minor office procedures" also includes intramuscular, intravenous, subcutaneous, and intradermal injections of substances consistent with the practice of naturopathic medicine and in accordance with rules established by the secretary. R.C.W. § 18.36A.040 (12)		authority to use the title "physician" cannot be located in state statutes or regulations.
West Virginia	Not licensed				

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