



Naturopathic Doctor (ND) Prescribing Rights by State

State	Prescriptive Rights	Supervised/Independent
Alaska	None	
Arizona	Legend drugs, Sch. II (limited), Sch. III-V; medical marijuana (see below for details & limitations ¹)	Independent
California	Legend drugs and Sch. III-V (see notes below)	Hormones, independent Legend drugs and Sch. III-V with supervision**
Colorado	None ²	
Connecticut	None	
Hawaii	Legend drugs per naturopathic formulary	Independent
Idaho	Noncontrolled legend drugs and testosterone ³	Independent
Kansas	No legend drugs or controlled substances ⁴	
Maine	Limited noncontrolled legend drugs ⁵	Independent, one-year supervision required**
Maryland	None ⁶	Independent
Massachusetts	None	
Minnesota	None ⁷	
Montana	Legend drugs and Sch. II-V per formulary	Independent
New Hampshire	Legend drugs and Sch. III per formulary	Independent
New Mexico	Legend drugs and Sch. III-V, excluding all benzodiazapines, opioids, and opioid derivatives ⁸	Independent
North Dakota	None	
Oregon	Legend drugs and Sch. II-V, with limited exceptions ⁹	Independent

¹¹ See [AZ prescriptive authority chart 2019](#). Sch. II: Only Morphine (no IV doses) and Hydrocodone combos previously Sch. III. NDs cannot prescribe IV medications (except vitamins, chelation therapy, and drugs used in emergency resuscitation and stabilization), cancer chemotherapeutics, or antipsychotics. NDs can prescribe medical marijuana, and they need a Certificate to Dispense natural substances, drugs, and devices. See <https://nd.az.gov/forms/certificate-dispense>.

² NDs cannot generally prescribe legend drugs in Colorado - with very limited exceptions. See [naturopathic formulary](#) (pages 7-8). Per Dr. Denise Clark in Colorado, NDs are limited to vaccines for those over 18 years of age, oxygen, and epinephrine, no supervision required.

³² See <https://adminrules.idaho.gov/rules/current/24/243304.pdf>.

⁴ There is a formulary for IV administration only. <http://www.ksbha.org/statutes/booklets/naturopath.pdf>. It requires a written protocol with an MD/DO. However, due to the corporate practice of medicine act in KS, it is dicey to have physician collaboration. While legal by statute to have oversight and provide via written protocol with an MD/DO, according to the corporate practice of medicine, it is not legal for NDs to pay MDs/DOs. It is a gray area the Kansas association hopes to fix. Source: Aug. 2020 email from Dr. Laura Rues.

⁵ See <http://www.mainelegislature.org/legis/statutes/32/title32sec12522.html>, paragraph 4B.

⁶ See <http://www.dsd.state.md.us/comar/comarhtml/10/10.32.21.08.htm>.

⁷ See <https://www.revisor.mn.gov/statutes/cite/147E.05#stat.147E.05>.

⁸ See <https://www.nmlegis.gov/Sessions/19%20Regular/final/SB0135.pdf>.

⁹ See <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=254159>.

State	Prescriptive Rights	Supervised/Independent
Pennsylvania	None	
Puerto Rico	None	
Rhode Island	None	
US Virgin Islands	None	
Utah	Noncontrolled legend drugs in formulary and testosterone	Independent
Vermont	Legend drugs and Sch. II-V (must have “special endorsement” to prescribe ¹⁰)	Independent after supervision for one year or 100 prescriptions**
Wisconsin	None	
Washington	Legend drugs + codeine and testosterone products in Sch. III-V ¹¹ ; medical marijuana	Independent
Washington DC	Limited legend drugs per formulary ¹² and testosterone	Independent

Note: A legend drug is an FDA approved drug that can only be dispensed with a prescription from a licensed practitioner (MD, DO, ND, PA, NP, etc.). Within legend drugs, there are scheduled substances ([Schedules I-IV](#)) that may have potential for abuse and have different levels of control.

*To access individual state statutes & rules, see <https://fnmra.org/ras>.

See also https://www.deadiversion.usdoj.gov/drugreg/practioners/mlp_by_state.pdf.

****Details regarding supervision requirements:**

- **California** requires NDs to be supervised by an MD or DO to prescribe legend and scheduled drugs, but NDs can independently prescribe epinephrine for anaphylaxis, natural and synthetic hormones, including testosterone with a DEA license, as well as vitamins, minerals, amino acids, glutathione, and other similar substances if they are chemically identical to those for sale without a license.¹³
- NDs have a limited scope of prescriptive authority in **Maine**, which requires a collaborative relationship for one year for NDs to prescribe. In an ND’s first year of practice, prescribed medications must be reviewed (quarterly) by an MD or DO, and an ND must submit paperwork from the supervising MD/DO when renewing his/her ND license.¹⁴
- **Vermont** requires a naturopathic physician to take and pass the NPLEX elective pharmacology exam (EPE) to have “open prescribing” rights via a prescriptive authority

¹⁰ See https://sos.vermont.gov/media/hrmngttv/nat_rules.pdf.

¹¹ See <https://apps.leg.wa.gov/WAC/default.aspx?cite=246-836-210>.

¹² DC’s limited formulary includes very few legend drugs, specifically naturally-derived, which are bio-identical hormones and select antimicrobials. Source: August 2020 email from Dr. Anne Berkeley.

¹³ Sources: August 2020 emails with Kathy Konst, Executive Director of the California Naturopathic Doctors Association, and Dr. Stephanie Berg, ND, JD, in California. See also

http://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=BPC&division=2.&title=&part=&chapter=8.2.&article=4.

¹⁴ Sources: August 2020 emails with Dr. Anne Jacobs and Dr. Elizabeth Yori, president of the Maine Association of Naturopathic Doctors. See also <http://www.mainelegislature.org/legis/statutes/32/title32sec12522.html>, paragraph 4C.

“special” endorsement. The state discontinued use of a formulary as it was too costly and burdensome to maintain, and no other physicians had formularies. After a new NDs’ first year of prescribing or first 100 prescriptions, whichever comes later, his or her prescribing practices are evaluated by an MD, DO, or ND with at least five years of open prescribing rights in Vermont to ensure that the naturopathic physician is prescribing appropriately. For a naturopathic physician to evaluate NDs’ prescribing practices, s/he must have been evaluated himself or herself, and it must be five years after the date of evaluation and sign-off on his or her prescribing rights.¹⁵

Additional note regarding the NPLEX Elective Pharmacology Examination (EPE):

Four states, Idaho, New Mexico, Oregon, and Vermont, require NDs to take and pass the NPLEX EPE.

¹⁵ Sources: August 2020 emails and calls with Dr. Joshua Green, president of the Vermont Association of Naturopathic Physicians. See also https://sos.vermont.gov/media/hrmngtty/nat_rules.pdf.