

ALASKA LEGISLATURE COMMITTEE FILES

2007-2008

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## BACKGROUND

Modern Naturopathic medicine, introduced in the United States near the end of the 19<sup>th</sup> century, emphasizes the belief that the human body has the inherent ability to establish, maintain, and restore health. Naturopathic practitioners facilitate this ability by employing natural, non-toxic therapies and modalities, by identifying and removing obstacles to health and recovery, and by supporting the creation of healthy internal and external environments. Although naturopathy is considered "alternative" medicine, some of its techniques and remedies have been practiced for centuries.<sup>1</sup> Since the 1970s, naturopathy has seen steady growth in the number of doctors in practice and patients under care. This growth is likely to continue at a rapid rate as healthcare costs rise and as some naturopathic practices are further incorporated into the curricula of "traditional," or allopathic, medical schools.

Naturopathic practitioners in the U.S. are represented by two national organizations whose philosophies regarding licensure are in sharp opposition. The American Naturopathic Medical Association (ANMA), founded in 1981 and reporting approximately 4,000 members, is opposed to state licensing and certain aspects of the accompanying educational requirements. The ANMA supports professional certification through the American Naturopathic Certification Board rather than governmental involvement in the form of state regulated licensure.<sup>2</sup> By contrast, the American Association of Naturopathic Physicians (AANP) advocates for licensing and regulatory regimes in all 50 states. Founded in 1985, the 1,800 member AANP would like the titles "Naturopathic Doctor (ND)" and "Naturopathic Physician (NP)" reserved for those who have attended four years of graduate-level study which includes training in clinical nutrition, acupuncture, homeopathic medicine, botanical medicine, psychology, and counseling, in addition to the basic sciences required of Medical Doctors (MDs).<sup>3</sup> Further, the AANP advocates the use of the Naturopathic Physicians Licensing Examination (NPLEX)—an intensive five-part professional exam—as part of each state's licensing requirements. The AANP contends that rigorous licensing regimes will instill in consumers a level of confidence that will allow naturopathy to continue moving toward integration into the mainstream medical community.<sup>4</sup>

## LICENSING STATES AND THE NUMBER OF NATUROPATHIC DOCTORS THEREIN

Thirteen states currently license NDs: Alaska, Arizona, California, Connecticut, Hawaii, Kansas, Maine, Montana, New Hampshire, Oregon, Utah, Vermont, and Washington.<sup>5</sup> Each of these

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<sup>1</sup> The Federation of Naturopathic Physician Licensing Authorities provides further information on the history and philosophy of naturopathy on its website at: [www.fnpla.org](http://www.fnpla.org).

<sup>2</sup> More information on the ANMA can be found on its website at [www.anma.com/index.html](http://www.anma.com/index.html).

<sup>3</sup> More information on the AANP can be found on its website at [www.naturopathic.org/index.html](http://www.naturopathic.org/index.html).

<sup>4</sup> The Center for Health Professionals, University of California, San Francisco, in 2001 published an extensive report on the practice of naturopathy, which includes comparisons of naturopathic philosophies and detailed information on regulatory and professional aspects of naturopathic medicine. We include a copy of "Profile of a Profession: Naturopathic Practice" as Attachment A.

<sup>5</sup> Florida discontinued licensing NDs in 1957. As a result, only NDs holding licenses at that time are still permitted to practice in the state.

states has a unique licensing and/or advisory board as part of its regulatory structure, except Alaska and Vermont, where state agencies manage all aspects of licensing NDs.<sup>6</sup>

According to information compiled from licensing states by the University of California, San Francisco (UCSF), there were approximately 1,356 state-licensed NDs nationwide in 2000.<sup>7</sup> This number has increased substantially in subsequent years as accredited naturopathic medical schools have graduated up to 600 NDs each year.<sup>8</sup> Recent research by the AANP indicates that at least 2,700 individual NDs are now state-licensed.<sup>9</sup> Although we contacted the regulatory authority in each licensing state to determine the precise number of licensed NDs, we have not yet received responses to all of our requests. In states where such information is available, however, there have been dramatic increases in the number of licensees in recent years. The combined total of licenses from Hawaii, Oregon, Vermont, and Washington has increased about 100% since 1998 from 996 to 1,999. In 2001, The UCSF's Center for Health Professionals published a detailed profile of the practice of naturopathy, which included information on the number of NDs in each licensing state. Table 1 shows the licensing states, the regulatory body for each, and the number of naturopathic doctors they license, as reported by the UCSF. Not surprisingly, as Table 1 illustrates, licensed NDs are concentrated in Arizona, Connecticut, Oregon, and Washington—the states with accredited schools of naturopathic medicine.

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<sup>6</sup> We include, as Attachment B, a list of state licensing authorities and contact information for each. In addition, we include a copy of the 1998 Sunrise Review by the Colorado Department of Regulatory Authorities, Office of Policy and Research, regarding licensure of Naturopathic Physicians as Attachment C.

<sup>7</sup> This figure does not include an estimated 207 AANP affiliated NDs who in 2000 were outside of licensing states. Further, the estimates in this report do not include the number of NDs practicing strictly under professional certification. Due to a lack of verifiable data, estimating the number of such NDs is problematic.

<sup>8</sup> The Washington Association of Naturopathic Physicians cites this figure on its website at [www.wanp.org/faq/history.asp](http://www.wanp.org/faq/history.asp). The Council on Naturopathic Medical Education (CNME) is recognized by the U.S. Department of Education as the accrediting body for schools granting the degree of "Naturopathic Doctor." More information on the CNME can be found online at [www.cnme.org](http://www.cnme.org). A list of accredited schools of naturopathic medicine can be found on the AANP website at [www.naturopathic.org/licensure/accredited\\_schools.html](http://www.naturopathic.org/licensure/accredited_schools.html).

<sup>9</sup> Discussions with AANP staff located in Washington D.C., (202) 895-1332.

**Table 1: State-Licensed Naturopathic Doctors, 2000**

State	Year Law Enacted	Regulatory Body	Number of State-Licensed Naturopathic Doctors <sup>(a)</sup>
Alaska	1986	Division of Occupational Licensing, Naturopathic Licensing Section	21
Arizona	1935	Arizona Naturopathic Physicians Board of Medical Examiners	127
California	2003	Bureau of Naturopathic Medicine	Not Applicable
Connecticut	1920	Board of Naturopathic Examiners	106
Florida <sup>(b)</sup>	1927	Licensing abolished in 1957	56
Hawaii	1925	Board of Examiners in Naturopathy	63
Kansas	2003	Board of Healing Arts	Not Applicable
Maine	1996	Board of Complementary Health Care Providers	10
Montana	1991	Board of Alternative Health Care	41
New Hampshire	1997	Naturopathic Examiners Board	19
Oregon	1927	Board of Naturopathic Examiners	410
Utah	1996	Naturopathic Physician's Licensing Board	19
Vermont	1996	Office of Professional Regulation	63
Washington	1919	Naturopathic Physicians Advisory Committee	427
<b>Total in year 2000</b>			<b>1,362</b>
<b>Approximate Total in Year 2003<sup>(c)</sup></b>			<b>2,700</b>
<p>Notes: a) Licensed Naturopathic Doctors (NDs) represents the estimated number of licensed individuals in 2000. Due to NDs often being licensed in more than one state, the total number of licenses issued is likely substantially greater than the number of individual doctors.</p> <p>b) Florida discontinued licensing in 1959. As a result, only those NDs licensed at that time are permitted to practice in the state.</p> <p>c) This figure is from December 2003 research by the American Association of Naturopathic Physicians.</p> <p>Sources: Colorado Department of Regulatory Authorities, Office of Policy and Research, "1998 Sunrise Review: Naturopathic Physicians," p. 22, October, 1998; available online at <a href="http://www.dora.state.co.us/opr/archive/98naturopath.pdf">www.dora.state.co.us/opr/archive/98naturopath.pdf</a>.</p> <p>Holly J. Hough, Ph.D., Catherine Dower Ph.D., and Edward H. O'Neil, Ph.D., "Profile of a Profession: Naturopathic Practice," Center for Health Professions, University of California, San Francisco, p. 12, September, 2001; available online at <a href="http://www.futurehealth.ucsf.edu/pdf_files/Naturo2.pdf">www.futurehealth.ucsf.edu/pdf_files/Naturo2.pdf</a>.</p> <p>American Association of Naturopathic Physicians; online at <a href="http://www.naturopathic.org">www.naturopathic.org</a>.</p>			

**STATES RECENTLY OR CURRENTLY CONSIDERING LICENSURE**

At least five states—Florida, Idaho, Massachusetts, Missouri, and New York—have recently considered legislation requiring licensure for NDs.<sup>10</sup> Although none of the measures in these states became law, groups advocating licensure as well as those opposed expect similar bills to

<sup>10</sup> We include, as Attachment D, copies of legislation recently considered in Florida, Idaho, Missouri, and New York.

be considered in upcoming legislative sessions. In addition, at least four states—Colorado, Louisiana, New Mexico, and North Carolina—have created or are considering creating task forces for researching the possibility of establishing licensing regimes. Because the AANP and its 34 associated state chapters actively lobby for licensing schemes in all 50 states, legislation is likely to be introduced in a number of other states in coming years.

**SELECTED FUNCTIONS: PRESCRIPTIONS, MINOR SURGERY, AND COLLABORATION**

Generally, states allow NDs to prescribe naturopathic remedies such as herbal supplements and tinctures. As Table 2 shows, at least five states—Arizona, California, Montana, Oregon, and Vermont—give NDs further limited authority to prescribe certain medications that appear in the schedules of the Controlled Substances Act (21 USC, § 801-971). Some states' laws, those of Washington and Maine for instance, grant prescriptive privileges to NDs based on the "legend" and "non-legend" classifications of the official United States pharmacopoeia. Privileges for "legend" drugs—the substances for which dispensation without a prescription is a federal offense—are generally unavailable or limited for NDs.

**Table 2: States' Prescriptive Authority for Licensed Naturopathic Doctors**

State	Prescriptive Authority <sup>1</sup>	Controlled Substances Act Schedules <sup>2</sup>				
		I	II	III	IV	V
Alaska	No					
Arizona	Yes		X	X	X	X
California	Yes <sup>3</sup>			X	X	X
Connecticut	No					
Hawaii	No					
Kansas	No					
Maine	Limited <sup>4</sup>	Not Applicable				
Montana	Yes		X	X		
New Hampshire	No					
Oregon	Yes		X	X	X	X
Utah	No					
Vermont	Yes <sup>5</sup>			X	X	
Washington	Limited <sup>4</sup>	Not Applicable				

Notes: 1) Prescriptive authority is the ability to prescribe controlled substances as identified in schedules I-IV of the Controlled Substance Act (21 USC, Sections 801-971). The laws of Maine and Washington refer to the "legend" and "non-legend" classifications of the official United States pharmacopoeia, rather than to the Controlled Substances Act, to establish which drugs Naturopathic Doctors (NDs) are permitted to prescribe. "Legend" drugs are those for which a prescription is required by federal law.  
 2) The schedules of the Controlled Substances Act are available on the U.S. Drug Enforcement Agency's website at [www.usdoj.gov/dea/pubs/scheduling.html](http://www.usdoj.gov/dea/pubs/scheduling.html).  
 3) Pursuant to California Code § 3640.5, NDs may only prescribe controlled drugs under the supervision of a physician.  
 4) In Maine, NDs are permitted to prescribe "non-controlled legend drugs" only after a twelve-month period of review by a physician. Such drugs may only be from the following categories: homeopathic remedies, vitamins and minerals, hormones, local anesthesia and immunizations that are designated by rule. No drugs that appear in the schedules of the federal Controlled Substances Act may be prescribed by NDs in Maine. In Washington, only certain legend drugs, primarily those derived from animals and certain other natural sources, are permitted.  
 5) Vermont allows NDs to prescribe only testosterone from schedule III and codeine from schedule IV.  
 Source: Lexis database search of states' statutes and administrative codes.



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## MINOR SURGERY

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States' definitions of "minor surgery," frequently found under the heading of "office procedures," generally include care related to superficial wounds where only local anesthesia is required. At least six states—Arizona, Maine, Montana, Oregon, Utah, and Washington—allow NDs to conduct some level of minor surgical procedures.<sup>11</sup> The legal definitions of minor surgery used in the laws of Maine and Oregon, which are typical of those used by other states, are as follows:

### **Maine Revised Statute § 12501(13)**

"Office procedures" means methods for the repair and care incidental to superficial lacerations and abrasions, superficial lesions and the removal of foreign bodies located in the superficial tissues. The use of antiseptics and local anesthetics in connection with these methods is permitted. The use of general, regional or spinal anesthetics, major surgery, surgery of the body cavities or specialized surgeries such as plastic surgery, surgery involving the eye or surgery when tendons are involved is not permitted.

### **Oregon Revised Statute § 685.010(4)**

"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 located in the superficial structures; and the use of antiseptics and local anesthetics in connection therewith.

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## COLLABORATION CLAUSES

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At least five states provide for collaboration between NDs and physicians. Four of these states mandate that NDs collaborate with physicians in certain circumstances: California requires consultation with an "appropriately licensed professional" when NDs review x-rays and other internal imaging; Maine mandates that NDs be monitored by a physician for one year prior to independently prescribing "non-controlled legend drugs;" and Utah and Vermont provide for collaboration between NDs and physicians in child-birthing, although Vermont limits the extent of that collaboration. At least one state—Washington—stipulates that nothing in the "scope of practice" language for NDs prohibits collaboration with physicians. The specific collaboration clauses we located are as follows:<sup>12</sup>

### **California—Business and Professions Code § 3640(b)**

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.

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<sup>11</sup> Colorado Department of Regulatory Authorities, Office of Policy and Research, p. 21, and Lexis database search of licensing states' laws.

<sup>12</sup> We located these clauses by manually searching licensing states' laws on naturopathy. While we believe our search of states' laws to be thorough, this list may not be exhaustive of all collaboration clauses.

§3640.5 provides that NDs may, under the supervision of a physician, prescribe drugs from schedules III through V of the Controlled Substances Act.

**Maine—32 MRS § 12522(4)(C)**

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.<sup>13</sup> The board shall further define the terms of the collaborative relationship by rule.

**Utah—UCA § 58.71.02(12)**

"Practice of naturopathic medicine" means:

(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:

(i) using naturopathic childbirth, but only if:

(A) the licensee meets standards of the American College of Naturopathic Obstetricians (ACNO) or its successor as determined by the division in collaboration with the board; and

(B) the licensee follows a written plan for naturopathic physicians practicing naturopathic childbirth approved by the division in collaboration with the board, which includes entering into an agreement with a consulting physician and surgeon or osteopathic physician, in cases where the scope of practice of naturopathic childbirth may be exceeded and specialty care and delivery is indicated, detailing the guidelines by which the naturopathic physician will:

- (I) refer patients to the consulting physician; and
- (II) consult with the consulting physician.

**Vermont—Administrative Rules for Naturopathic Physicians § 3.9**

**Naturopathic Childbirth:** no licensee may practice naturopathic childbirth without first obtaining a special endorsement on his or her license. To obtain this endorsement, a licensee must:

(A) Show evidence of completion of a naturopathic childbirth or midwifery program from an approved naturopathic college or hospital and furnish a signed log showing evidence that sections (1), (2) and (3) of this subsection have been completed under the direct supervision of a licensed practitioner with specialty training in obstetrics or natural childbirth.

- (1) The licensee must taken part in the care of 50 cases each in prenatal and postnatal care. One case may qualify for both areas of care.
- (2) The licensee must have observed and assisted in the intrapartum care and delivery of 50 natural childbirths in a hospital or alternative birth setting 3 of which must have occurred within the last two years. A minimum of 26 of these births must be under the supervision of a naturopathic physician. No more than 10 of the 50 births may be

<sup>13</sup> Non-controlled legend drugs, in this context, include the following categories: homeopathic remedies, vitamins and minerals, hormones, local anesthesia and immunizations that are designated by rule. No drugs that appear in the schedules of the federal Controlled Substances Act may be prescribed by NDs in Maine.

states differ in their definitions of terms such as "complaint" and "disciplinary action." Further, although we requested information on disciplinary action from the states that license NDs, we have not yet received responses from each. For these reasons, performing a comparison of states' disciplinary actions against NDs to those against physicians is problematic.

Colorado's 1998 Sunrise Review (see Attachment C) provides information on complaint activity in the eleven states that licensed NDs at that time. Table 3 shows complaint activity by state against NDs, where available, for 1997 and 1998, compared to disciplinary actions taken against physicians over the same time period. It is important to note that the information for NDs represents *all complaints* whereas the data for physicians is *only* for cases in which disciplinary action was taken, which likely encompass only a fraction of all complaints against physicians. Regrettably, the data available to us within the time constraints of our research do not allow for an "apples to apples" comparison of disciplinary activity. It is clear, however, that for both NDs and physicians, complaints and subsequent disciplinary action are rare relative to the number of practicing licensees.

**Table 3: Complaints Against Naturopathic Doctors and Disciplinary Actions Against Physicians In Selected States 1997-1998**

State	Licensed Naturopathic Doctors				Licensed Physicians			
	Number in 1998	Complaints <sup>1</sup>		Complaints per 100 NDs	Number in 1998	Disciplinary Actions <sup>1</sup>		Actions per 100 Physicians
		1997	1998			1997	1998	
Alaska	20	0	0	0.0	1,887	13	28	2.2
Arizona	169	7	7	8.3	10,807	202	125	3.0
Connecticut	197	2	1	1.5	12,946	59	55	0.9
Hawaii	60	Not Available			6,122	14	15	0.5
Maine	12	0	0	0.0	5,216	25	34	1.1
Montana <sup>2</sup>	33		5	15.2	3,231	12	8	0.6
New Hampshire	12	1	1	16.7	4,039	9	18	0.7
Oregon	325	Not Available			11,386	47	43	0.8
Utah	5	0	0	0.0	6,894	22	32	0.8
Vermont <sup>3</sup>	34	3	1	11.8	2,745	11	17	1.0
Washington <sup>2</sup>	369		15	4.1	18,319	98	84	1.0
<b>Totals</b>	<b>1,236</b>	<b>43</b>		<b>3.5</b>	<b>83,592</b>	<b>971</b>		<b>1.2</b>

Notes: 1) All complaints filed against Naturopathic Doctors (NDs) with state regulatory agencies are shown; whereas, for physicians, only complaints culminating with disciplinary actions by state medical boards are shown. Disciplinary actions against physicians are likely taken in only a fraction of the total complaints filed. As a result, a direct comparison of the figures for the two groups is problematic.

2) Montana and Vermont, respectively, reported complaint totals for NDs as one sum.

3) Figures for Vermont physicians exclude data for the state's approximately 100 Osteopathic Doctors, which are not reported to the Federation of State Medical Boards. All other states include data on Osteopaths.

Sources: NDs--Colorado Department of Regulatory Authorities, Office of Policy and Research, "1998 Sunrise Review: Naturopathic Physicians," p. 22, October, 1998; available online at [www.dora.state.co.us/opr/archive/98naturopath.pdf](http://www.dora.state.co.us/opr/archive/98naturopath.pdf); Physicians--Federation of State Medical Boards of the United States, Inc., "Summary of Board Actions," 1997-1998, available online at [www.fsmb.org](http://www.fsmb.org).

I hope you find this information to be useful. Please do not hesitate to contact us if you have questions or need additional information.



## Naturopathic Disciplinary Reports

### Appendix D: Comparison of Allopathic and Naturopathic Disciplinary Reports

Medical boards receive complaints and after investigation met out disciplinary actions. Information on complaints and disciplinary actions is not available for several states. Of 13 states that license Naturopathic physicians, information on disciplinary actions could only be found for six states including Alaska, Arizona, Hawaii, Oregon, New Hampshire and Washington. These results are listed below (Table 1) for the years 2000-2003.

Table 1: Naturopathic Disciplinary Actions

	Dates	Alaska	Arizona	Hawaii	Oregon	New Hampshire	Washington
# Naturopaths		40	369	78	550	32	644
Avg. # complaints/yr(1)			not available	0.2	22.75	not available	10.75
<b>Disciplinary actions</b>	<b>2000-present</b>						
Reprimand/Corrective action	"	0	1	0	0	0	1
Probation	"	0	4	0	6	0	0
Suspension	"	0	1	0	0	0	0
Revocation/Surrender	"	0	1	0	2	0	0
<b>Total</b>		<b>0</b>	<b>7</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>1</b>

The total number of naturopathic doctors in the states was 2,033. The average number of disciplinary actions taken per year is 3.75  
 The average number of disciplinary actions per year was 3.75 for 2000-2003  
 The yearly rate of disciplinary actions per 100 doctors per year is 0.34.

## Naturopathic Disciplinary Reports

Arizona and Oregon are two of the three states with the largest population of naturopathic doctors and a long history of licensure. Disciplinary actions are compared between naturopathic and allopathic doctors for each state (see tables 2 and 3).

Table 2: Comparison of Naturopathic and Allopathic Disciplinary Actions in Arizona

Naturopathic Doctors	Year	Letters of Concern*	Reprimand	Probation	Suspension	Revocation	Surrender	Total Disciplinary
# 369	2000	1	1	1				2
	2001	1				1		1
	2002	2		3	1			4
	2003	2						0
<b>Total</b>		8	1	4	1	1		7
<b>Medical Doctors</b>								
#10,652	2003	unknown	38	35	8	11	9	101

\*Letters of concern are not considered disciplinary actions

The total number of naturopathic doctors in Arizona during 2000-2003 were 369. The total number of disciplinary actions during this time period was 7. The yearly rate of disciplinary actions per 100 doctors is 0.47.

The total number of medical doctors in Arizona during 2003 was 10,652. The total number of disciplinary actions during this time was 101. The yearly rate of disciplinary actions per 100 doctors is 0.95.

## Naturopathic Disciplinary Reports

Table 3: Comparison of Naturopathic and Allopathic Disciplinary Actions in Oregon

Naturopathic Doctors	Year	Complaints	Reprimand/corrective action	Probation/restriction	Suspension	Revocation	Surrender	Total Disciplinary
# 550	2000	23	none reported	1	0	0	0	1
	2001	30	"	2	0	1	0	3
	2002	23	"	2	0	0	0	2
	2003	15	"	1	0	1	0	2
<i>Total</i>		91	"	6	0	2	0	8
<b>Medical Doctors</b>								
#11,583	2003	unknown	14	20	2	2	5	43

The total number of naturopathic doctors in Oregon during 2000-2003 was 550. The total number of disciplinary actions during this time period was 8. The yearly rate of disciplinary actions per 100 doctors is 0.36

The total number of medical doctors in Oregon during 2003 was 11,583. The total number of disciplinary actions during this time was 43. The yearly rate of disciplinary actions per 100 doctors is 0.37.

**Sources:**

Arizona Board of Naturopathic Examiners: [www.npbomex.az.gov](http://www.npbomex.az.gov)

Arizona Board of Medical Examiners: [http://www.azmdboard.org/Agency\\_Reports/md\\_stats.pdf](http://www.azmdboard.org/Agency_Reports/md_stats.pdf)

Hawaii Board of Naturopathic Examiners: [naturopathy@dcca.hawaii.gov](mailto:naturopathy@dcca.hawaii.gov)

Oregon Board of Naturopathic Examiners: [www.obnme.state.or.us](http://www.obnme.state.or.us)

Oregon Board of Medical Examiners: [www.bme.state.or.us](http://www.bme.state.or.us)

New Hampshire Dept. HHS, Board of Naturopathic Examiners: (603)271-5127 License Clerk, Janet

New Hampshire Board of Medicine: <http://www.nh.gov/medicine/cid/disciplinary.html>

Washington Health Professions Quality Assurance, Naturopathy Program: [Holly.Rawnsley@doh.wa.gov](mailto:Holly.Rawnsley@doh.wa.gov)

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## Elevating Naturopathic Education

Carnegie Commission recommends giving naturopathic medicine a higher classification.

In December 2005, the U.S. Department of Education hosted a two-day Ad Hoc Internal Review Panel meeting, featuring representation by members of the DoE's Integrated Postsecondary Education Data System (IPEDS) and the Carnegie Commission of Higher Education. What transpired at that meeting could have a profound effect on the future of naturopathy education.

The Carnegie Commission is arguably the most prestigious, nonprofit, independent organization in American

higher education. The Carnegie classifications were created in 1970; at that time, there were approximately 2,800 U.S. colleges and universities. Today, more than 4,000 educational

**According to NCNM President William J. Keppeler, PhD, "This should have profound positive implications for the profession and greatly advance state licensure nationwide."**

institutions offer various programs and degrees. The DoE asks for Carnegie Commission recommendations, seeing them as the leading experts on higher education. The classifications help the

DoE determine such issues as which educational institutions should get government funding and how much.

Dr. William Keppeler, president of National College of Naturopathic Medicine, served as an IPEDS panel member. According to Dr. Keppeler, the panel's assignment was to review and revise the member-

ship of the Carnegie Commission's "First Professional Degree" category. The associate secretary for education was in attendance throughout all of

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## Overview of Naturopathic Regulation

Colorado Department of Regulatory Agencies  
October 14, 2005

The legal status of naturopathy varies from state to state. In some states, the practice of naturopathy, though not regulated, is protected through court rulings or attorney general opinions. In most states, naturopathic physician status is unprotected or unclear. Two states, Florida and Nevada, have repealed regulation of this profession. Nevada ceased licensing naturopathic physicians in 1987 (in Nevada naturopathic physicians were required to be supervised by medical doctors). Although naturopathic licensing in Florida was discontinued in 1959, there are still laws and a board regulating those naturopaths still practicing. Florida allows naturopathic physicians licensed prior to program termination dates to continue to practice. In Tennessee and in South Carolina, the practice of naturopathy is illegal. Tennessee law, for example, provides that the practice of naturopathy is a Class B misdemeanor, but renders this prohibition inapplicable to "persons who comply with the regulatory laws of the state with respect to the practice of the various healing arts." Without a similar textual qualification, however, a South Carolina statute prohibits the practice of naturopathy and subjects offenders to a fine not to exceed \$500 or imprisonment for a period not exceeding one year, or both.

The multiplicity of therapies and techniques that typically comprise the statutory definition of naturopathy may often fall within the scope of practice for other professions. The Montana Naturopathic Practice Act expressly acknowledges this fact by recognizing that many of the therapies used by naturopathic physicians, such as the use of nutritional supplements, herbs, foods, homeopathic preparations, and such physical forces as heat, cold, water, touch, and light, are not the exclusive privilege of naturopathic physicians, and their use, practice, prescription, or administration by persons not licensed to practice naturopathic medicine is not prohibited by this practice act.

Currently, 15 states and the District of Columbia license naturopathic physicians: Alaska, Arizona, California, Connecticut, Florida, Hawaii, Idaho, Kansas, Maine, Montana, New Hampshire, Oregon, Utah, Vermont, and Washington. In several states, licensed naturopathic physicians must also qualify for a certificate to practice natural childbirth, acupuncture, or to dispense a natural substance or device. The following highlights the regulatory programs found in the 15 states.

### Alaska

Alaska's law places several restrictions on the practice of naturopathy. A person who practices naturopathy may not prescribe a prescription drug, perform surgery, or use the word "physician" as a title. There are currently 36 licensed naturopathic doctors in Alaska.



## **Arizona**

Arizona's Naturopathic Physicians Board of Medical Examiners (Arizona Board) was established in 1935. Arizona remains the state with the third highest number of licensed naturopathic physicians (400). The Arizona Board has the statutory authority to adopt rules for recognizing naturopathic specialties. The Arizona Board has approved training programs in four specialty areas and has issued certificates to at least 16 naturopaths in the specialty of family medicine. Additionally, the Arizona Board has assembled a formulary of more than 460 items that naturopathic physicians may dispense including both prescription drugs and some controlled substances. In 2000, the Arizona Board underwent a performance audit. The review concluded that terminating the Arizona Board would not significantly harm the public's health and safety since the practice of medicine would continue to be regulated by the Allopathic Board of Medical Examiners. Naturopaths could continue to perform many traditional activities, but would no longer be allowed to act as primary medical care providers. However, the review further stated that terminating the Arizona Board could harm the public's welfare by potentially limiting access to alternative medical care. Subsequently, there was no action taken by the Arizona legislature to repeal the Arizona Board.

## **California**

California's Bureau of Naturopathic Medicine (Bureau) within the Department of Consumer Affairs was established to administer the Naturopathic Doctor's Act and was authorized to collect fees and receive license applications beginning January 1, 2004. This act authorizes the creation of an advisory committee comprised of three licensed naturopathic doctors, three licensed physicians, and three public members. The committee's first meeting was convened on December 13, 2004. Additionally, a naturopathic formulary advisory committee was formed and a naturopathic childbirth attendance advisory committee was created to issue recommendations concerning the practice of naturopathic childbirth attendance. The scope of practice for licensed naturopathic doctors includes diagnosis and treatment of patients, including the authority to order lab tests and prescribe most drugs subject to supervision of a medical or osteopathic physician. Licensed naturopathic doctors may perform minor procedures, such as treating lacerations and removing moles and growths. The program began accepting license applications in January 2005. Currently there are 129 licensed naturopathic doctors in California.

## **Connecticut**

Connecticut's law, which was enacted in 1920, does not allow licensed naturopathic physicians to perform minor surgery, prescribe drugs, or practice obstetrics and gynecology. The statute requires that naturopathic physicians maintain professional liability insurance. There are currently 196 licensed naturopaths in Connecticut.

## **District of Columbia**

In May 2004, final approval was given to the Naturopathic Medicine Licensing Amendment Act of 2004 to license naturopathic physicians as primary care providers. The act recognized naturopathic physicians who have completed four-years of naturopathic medical college training and successfully passed the NPLEX. Prior to the passage of this act, the District of Columbia had a registration program for naturopaths. A person registered to practice naturopathy was entitled to use the title "Doctor of Naturopathy." The only requirements for

registration were that applicants must be at least 18 years of age and not have been convicted of a crime of moral turpitude that bears directly on the applicant's fitness to be registered. The practice specifically excluded the use of x-rays, performing any surgical procedure, injecting any substance into a person by needle, or performing any invasive procedure. As of September 2005, the District of Columbia had not promulgated any rules or issued any licenses.

### **Florida**

Florida's licensing authority for naturopathic physicians was abolished in 1959 and licensees who were licensed at that time were allowed to continue practicing naturopathic medicine. Draft legislation proposed by the Florida Naturopathic Physician Association was introduced in 2004 to reestablish regulation of naturopathic medicine through licensure and to create the Board of Naturopathic Medicine within the Department of Health. A 2004 Sunrise Report on Proposed Licensure of Naturopathic Physicians, by the Florida House of Representatives, Committee on Health Care, concluded that while there is evidence for support of licensure based on the existence of accredited training programs and licensure examinations, there is no documented evidence of substantial risk from not licensing naturopathic physicians. Moreover, there is potential risk from licensing naturopathic physicians and allowing them to provide a broad range of primary care services.

### **Hawaii**

Hawaii has regulated naturopathic physicians since 1925. There are currently 81 licensed naturopaths. Originally, the Board of Health was responsible for conducting examinations and issuing licenses. In 1969, the regulation was transferred to the Department of Regulatory Agencies, now the Department of Commerce and Consumer Affairs. The regulation of naturopathy was reviewed in 1978 and 1985, with continued regulation recommended in both instances.

### **Idaho**

Idaho became the 15th state in 2005 to create a licensure program for naturopathic physicians. The legislation is a full scope and title protection act. The law requires the creation of a formulary council to determine pharmaceutical privileges for naturopathic physicians.

### **Kansas**

Kansas passed legislation during the 2002 legislative session to regulate the practice of naturopathic medicine. The bill, signed into law in May 2003, provides registration for naturopathic doctors, rather than licensing, yet requires educational and testing requirements. Naturopathic medicine is defined to include such procedures as venipuncture, naturopathic acupuncture, and minor office procedures. Naturopathic doctors may not perform surgery, practice obstetrics, administer ionizing radiation or prescribe, dispense or administer any controlled substances or any prescription-only drugs except those listed on the naturopathic formulary adopted by the Kansas board.

### **Maine**

Maine's Board of Complimentary Health Care Providers regulates 19 naturopathic doctors. Naturopathic doctors have the exclusive right to the use of the terms "naturopathic doctors,"

"naturopathic," "naturopath," "doctor of naturopathic medicine," "Doctor of Naturopathy," "naturopathic medicine," "naturopathic health care," "naturopathy," and "N.D." Use of the term "physician" by a licensee is prohibited. Naturopathic Doctors have a limited scope of prescriptive authority.

### **Montana**

Montana's Naturopathic Health Care Practice Act was enacted in 1991 to regulate lay midwives and naturopathic physicians. Naturopathic physicians are authorized to perform minor surgery, attend a natural childbirth if in possession of a certificate of specialty practice, and prescribe certain drugs as established by the natural substance formulary list. When the program first began there were only five licensed naturopathic physicians in the state, however, as of August 2005, there were 66.

### **New Hampshire**

New Hampshire's Naturopathic Health Care Practice Act was enacted in 1994. Specialty certificates in naturopathic childbirth and acupuncture are offered. Doctors of naturopathic medicine with specialty certification in naturopathic childbirth are authorized to use oxytocin and pitocin. There are currently 36 licensed naturopathic physicians in New Hampshire.

### **Oregon**

Oregon first began licensing naturopathic physicians in 1927, although they were able to practice before then under an exemption in the Osteopathic Practice Act. The total number of licensed naturopathic physicians in Oregon equals 636, ranking second for licensees in a state. Oregon also has the most encompassing law as practitioners are allowed to prescribe drugs, perform minor surgery, and practice natural childbirth with a certificate of special competency.

### **Utah**

Utah's Naturopathic Physicians Licensing Board was created in 1996. The board currently issues five different categories of licenses: naturopath, naturopath including surgery/obstetrics, naturopathic physician, temporary naturopathic physician, and naturopathic controlled substance. In order to perform naturopathic childbirth, a licensee must satisfy the standards of the American College of Naturopathic Obstetricians or its successor.

### **Vermont**

Vermont's licensed naturopathic physicians may order, prescribe, dispense, and administer certain medications of mineral, animal, or botanic origin and must adhere to the Naturopathic Physician Formulary Rules promulgated by the Vermont Department of Health. Licensees may not practice naturopathic childbirth unless they have obtained a special endorsement that requires specific education; training; passage of an examination; and actual childbirth assistance, participation, and observation.

### **Washington**

Washington has regulated naturopathic physicians since 1919, as part of its law created to regulate professions engaged in "drugless healing." The law was substantially amended in 1988

to reflect the current practice of naturopathic physicians. The total number of licensed naturopathic physicians in Washington is 650, ranking first for licensees in a state.

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This article was posted on November 20, 2005.

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- [OnlyMyEmail](#): Award-winning anti-spam services.
- [Herbal Medicine. 3rd edition](#). Excellent reference book, discount-priced.



## Naturopathic Licensing Jurisdictions in the Unites States/Canada

U.S. States	Licensing Laws?	Jurisdiction Contact Information	Professional Associations
Alabama	No		Alabama Association of Naturopathic Physicians The Shoals Natural Health Care Center 503 State Street, Ste. 3 Muscle Shoals, AL 35661 Contact: Deborah Carter, ND Phone: (256) 386-9804 E-Mail: dacarter@bellsouth.net
Alaska	Yes	Alaska Department of Community and Economic Development Division of Occupational Licensing Naturopathic Section P.O. Box 110806 Juneau, AK 99811-0806 Contact: Vacant Fax: (907) 465-2974 Phone: (907) 465-2695 Email: license@commerce.state.ak.us Website: <a href="http://www.dced.state.ak.us/ocd/OccSearch/main.cfm">http://www.dced.state.ak.us/ocd/OccSearch/main.cfm</a>	Alaska Association of Naturopathic Physicians 10928 Eagle River Road Anchorage, AK 99577 Contact: Madeline Morrison Young, N.D. Phone: (907) 694-5522 E-Mail: <a href="mailto:esgledoc@mtsonline.net">esgledoc@mtsonline.net</a>
Arizona	Yes	State of Arizona Naturopathic Physicians Board of Medical Examiners 1400 W. Washington Ave. #230 Phoenix, AZ 85007 Contact: Gail Anthony Fax: (602) 542-3083 Phone: (602) 542-8242 Email: <a href="mailto:gail.anthony@npbomax.az.gov">gail.anthony@npbomax.az.gov</a> Website: <a href="http://www.npbomax.az.gov">http://www.npbomax.az.gov</a>	Arizona Naturopathic Medical Association AzNMA, Inc. 2101 E. Broadway Rd. Suite #14 Tempe, Arizona 85282 Contact: Deborah Mainville-Knight Fax: (480) 921-0061 Phone: (480) 921-3088 E-Mail: <a href="mailto:director@AzNMA.org">director@AzNMA.org</a> Website: <a href="http://www.aznma.org/">http://www.aznma.org/</a>
Arkansas	No		
California	Yes	Bureau of Naturopathic Medicine 1625 North Market Blvd., Suite S-202 Sacramento, CA 95834 Contact: Francine Devise Fax: (916) 574-8645 Phone: (916) 574-7991 Email: <a href="mailto:naturopathic@dca.ca.gov">naturopathic@dca.ca.gov</a> Website: <a href="http://www.naturopathic.ca.gov">http://www.naturopathic.ca.gov</a>	California Naturopathic Doctors Association 1121 "L" Street Suite 610 Sacramento, CA 95814 Contact: Gina Nick, ND - President Fax: (815) 550-2411 Phone: (826) 303-4300 E-Mail: <a href="mailto:executive@calnd.org">executive@calnd.org</a> Website: <a href="http://www.calnd.org/">http://www.calnd.org/</a>
Colorado			Colorado Association of Naturopathic Physicians 1111 Washington Ave., Suite 117 Golden, CO 80401 Contact: Dr. Kaycie Rosen, Secretary Phone: (970) 687-7071 E-Mail: <a href="mailto:kaycierosen@hotmail.com">kaycierosen@hotmail.com</a> Website: <a href="http://www.coanp.org/index.php">http://www.coanp.org/index.php</a>



## Naturopathic Licensing Jurisdictions in the United States/Canada

U.S. States	Licensing Laws?	Jurisdiction Contact Information	Professional Associations	
Connecticut	Yes	Office of Practitioner Licensing & Certification Naturopathic Licensure 410 Capitol Avenue MS#12APP Hartford, CT 06134-0308 Contact: Latasha Staring Fax: (860) 509-7803 Phone: (860) 509-7603 Email: <a href="mailto:opic.dph@po.state.ct.us">opic.dph@po.state.ct.us</a> <a href="http://www.dphstate.ct.us">http://www.dphstate.ct.us</a>	Connecticut Society of Naturopathic Physicians P.O. Box 120 Green Farms, CT 06436 Contact: K. Pramila Vishvanath, N.D. - President Phone: (877) 521-2767 Email: <a href="mailto:board@csnp2000.com">board@csnp2000.com</a>	Connecticut Naturopathic Association 408 Highland Avenue Cheshire, CT 06410 Contact: Debra Anastasio, ND - President Phone: (203) 271-1311 Email: <a href="mailto:info@hygeiacenter.com">info@hygeiacenter.com</a>
Delaware	No			
Florida	No		Florida Naturopathic Physicians Association 537 Fore Drive Bradenton, FL 34208 Contact: Michelle E. Clark, ND, ND - President Phone: (941) 747-0627 Email: <a href="mailto:contact@fnpa.org">contact@fnpa.org</a> Website: <a href="http://www.fnpa.org/index.cfm">http://www.fnpa.org/index.cfm</a>	
Georgia	No			
Hawaii	Yes	DCCA - PVL Naturopathic Licensing Board P.O. Box 3469 Honolulu HI 96801 Contact: Candace Itr Fax: (808) 586-1345 Phone: (808) 586-3000 Email: <a href="mailto:naturopathy@dcca.gov">naturopathy@dcca.gov</a> <a href="http://www.hawaii.gov/dcca/areas/pvl/boards/naturopathy/">http://www.hawaii.gov/dcca/areas/pvl/boards/naturopathy/</a>	Hawaii Society of Naturopathic Physicians 758 Kapehulu Ave. #451 Honolulu, HI 96816 Contact: Ye Ngyen, ND - President Phone: (808) 732-6986 Email: <a href="mailto:dr_nguyen@man.com">dr_nguyen@man.com</a> Website: <a href="http://www.hawaiind.org/index.htm">http://www.hawaiind.org/index.htm</a>	
Idaho	Yes	Idaho State Board of Naturopathic Medical Examiners Idaho Bureau of Occupational Licenses 1109 Main Street, Suite 220 Boise ID 83702-5642 Contact: Carrie Gilstrap Fax: (208) 334-3945 Phone: (208) 334-3233 Email: <a href="mailto:cgilstrap@ibol.idaho.gov">cgilstrap@ibol.idaho.gov</a> Website: <a href="http://ibol.idaho.gov/nat.htm">http://ibol.idaho.gov/nat.htm</a>	Idaho Association of Naturopathic Physicians 1216 W. Jefferson Street Boise, ID 83702 Contact: Joan Haynes, N.D. - President Phone: (208) 338-0405 Email: <a href="mailto:joanhaynes@aol.com">joanhaynes@aol.com</a>	
Illinois	No		Illinois Association of Naturopathic Physicians 2520 Elisha Avenue Zion, IL 60099 Contact: Julie Martin, ND Phone: (847) 735-9142 Email: <a href="mailto:julie.martin@mrmc-clca.com">julie.martin@mrmc-clca.com</a>	
Indiana	No			
Iowa	No			

## Naturopathic Licensing Jurisdictions in the United States/Canada

U.S. States	Licensing Laws?	Jurisdiction Contact Information	Professional Associations
Kansas	Yes	<p>Kansas Board of Healing Arts                      235 S. Topeka Boulevard                      Topeka KS 66603                      Contact: Katy Lenahan                      Fax: (785) 296-0852                      Phone: (785) 296-7413                      E-Mail: klenahan@ink.org                      Website: <a href="http://www.kcna.org/main.html">http://www.kcna.org/main.html</a></p>	<p>Kansas Naturopathic Physicians Association                      Natural Medical Care                      2601 W 6th Street Suite D                      Lawrence, KS 66049                      Contact: Mehdi Khosh, N.D. - President                      Phone: (785) 749-2255                      Email: drakhosh@yahoo.com</p>
Kentucky	No		
Louisiana	No		
Maine	Yes	<p>Dept. of Prof. &amp; Fin. Reg., Off. of Licensing &amp; Reg.                      Board of Complementary Health Care Providers                      #35 State House Station                      Augusta ME 04333                      Contact: Jeri Betts                      Fax: (207) 624-8637                      Phone: (207) 624-8603                      E-Mail: jeri.j.betts@maine.gov                      Website: <a href="http://www.maineprofessionalreg.org">www.maineprofessionalreg.org</a></p>	<p>Maine Association of Naturopathic Physicians                      Full Spectrum Health                      4 Milk Street                      Portland, ME 04101                      Contact: Devra Krassner, ND - President                      Phone: (207) 773-2517</p>
Maryland	No		<p>Maryland Association of Naturopathic Physicians                      10806 Reisterstown Road                      Suite 1E                      Owings Mills, MD 21117                      Contact: Stacey Kargman, ND - President                      Phone: (410) 358-4600                      Email: drskargman@yahoo.com</p>
Massachusetts	No		<p>Massachusetts Society of Naturopathic Physicians                      37 Appleton Street                      Melrose, MA 2176                      Contact: Carol A. Rainville, ND - President                      Phone: (617) 878-2660                      Email: drskargman@yahoo.com                      Website: <a href="http://www.msnd.org/index.htm">http://www.msnd.org/index.htm</a></p>
Michigan	No		<p>Michigan Association of Naturopathic Physicians                      4488 Jackson Road Suite 1                      Ann Arbor, MI 48103                      Contact: Michele Loewe ND - President                      Phone: (734) 389-2380                      Email: painting@earthlink.net</p>
Minnesota	No		<p>Minnesota Association of Naturopathic Physicians                      #05 Jefferson Ave #202                      Minneapolis, MN 55102                      Contact: Lindsay Pearson, ND                      Phone: (651) 221-4111                      Email: lpearson@mnap.org</p>
Mississippi	No		
Missouri	No		

## Naturopathic Licensing Jurisdictions in the United States/Canada

U.S. States	Licensing Laws?	Jurisdiction Contact Information	Professional Associations
Montana	Yes	Board of Alternative Health Care P.O. Box 200513 Helena MT 59620-0513 Contact: Cheryl Brandt Fax: (406) 841-2305 Phone: (406) 841-2394 E-Mail: <a href="mailto:Cbrandt@state.mt.us">Cbrandt@state.mt.us</a> Website: <a href="http://www.discoveringmontana.com/dli/shc">http://www.discoveringmontana.com/dli/shc</a>	Montana Association of Naturopathic Physicians PO Box 6069 Bozeman, MT 59771-6069 Contact: Marc Harris, N.D. - President Phone: (406) 586-1997 Email: <a href="mailto:kiluba@yahoo.com">kiluba@yahoo.com</a>
Nebraska	No		Nebraska Association of Naturopathic Physicians 7447 Farnam Street Omaha, NE 68114 Contact: Randall Bradley, ND - President Phone: (402) 391-6714 Email: <a href="mailto:RBrad5003@aol.com">RBrad5003@aol.com</a>
Nevada	No		
New Hampshire	Yes	NH DHHS Office of Program Support Board of Naturopathic Examiners 129 Pleasant Street, Brown Building Concord NH 03301-3857 Contact: Connie Beliveau Fax: (603) 271-5590 Phone: (603) 271-0863 E-Mail: <a href="mailto:connie.beliveau@dhhs.state.nh.us">connie.beliveau@dhhs.state.nh.us</a> Website: <a href="http://www.dhhs.state.nh.us">http://www.dhhs.state.nh.us</a>	New Hampshire Association of Naturopathic Physicians PO Box 10092 Concord, NH 03301 Contact: Nina Iselin, ND Phone: (603) 827-9885
New Jersey	No		New Jersey Association of Naturopathic Physicians 34 Bussell Court Dumont, NJ 07628 Contact: Jack Larmer, ND - President Phone: (201) 385-7106
New Mexico	No		New Mexico Association of Naturopathic Physicians PO Box 31552 Santa Fe, NM 87504-1552 Contact: Catherine Stauber, N.D. - President Phone: (505) 454-8525 Email: <a href="mailto:staubernd@cybermesa.com">staubernd@cybermesa.com</a>
New York	No		New York Association of Naturopathic Physicians 303 Park Avenue South #1175 New York, NY 10010 Contact: Donnielle Wilson, N.D. - President Phone: (800) 846-6778 Email: <a href="mailto:president@nyanp.org">president@nyanp.org</a> Website: <a href="http://www.nyanp.org/">http://www.nyanp.org/</a>
North Carolina	No		North Carolina Association of Naturopathic Physicians 301 West Weaver Street Carrboro, NC 27510 Contact: Steven Coward, ND Phone: (828) 230-7067 Email: <a href="mailto:ncanp@aol.com">ncanp@aol.com</a> Website: <a href="http://www.ncanp.com/">http://www.ncanp.com/</a>
North Dakota	No		

## Naturopathic Licensing Jurisdictions in the United States/Canada

U.S. State	Licensing Laws?	Jurisdiction Contact Information	Professional Associations
Ohio	No		Ohio Association of Naturopathic Physicians 2527 W Dublin-Granville Rd Columbus, OH 43017 Contact: Hakeem Lewis Phone: (614) 397-7999 ☐
Oklahoma	No		Oklahoma Association of Naturopathic Physicians Cancer Treatment Centers of America Naturopathic Med Clinic, 10109 E. 79th St. Tulsa, OK 74133 Contact: Katherine Anderson, ND - President Phone: 800-768-8485 Email: Katherine.Anderson@ctcoftulsa.com
Oregon	Yes	Oregon Board of Naturopathic Examiners 800 NE Oregon St. Suite 407 Portland, OR 97232 Contact: Anne Walsh Fax: (971) 673-0226 Phone: (971) 673-0193 E-Mail: obne.info@state.or.us Website: <a href="http://www.obne.state.or.us">http://www.obne.state.or.us</a>	Oregon Association of Naturopathic Physicians PO Box 5876 Portland, OR 97228 Contact: Mario Roxas, ND - President Phone: 877-500-8277 Fax: 503-262-8586 Email: info@oanp.org Website: <a href="http://www.oanp.org/">http://www.oanp.org/</a>
Pennsylvania	No		Pennsylvania Association of Naturopathic Physicians P.O. Box 847 Brownstown, PA 17508 Contact: Michael Reese, N.D. Phone: (717) 859-4222 Email: mresees@desupermal.net
Rhode Island	No		Rhode Island Association of Naturopathic Physicians Shella M. Frodermann, Ma ND 144 Waterman Street Providence, RI 02906 Contact: Shella M. Froderman, N.D. Phone: (401) 455-0546 Email: sfrodermann@hotmail.com
South Carolina	No		
South Dakota	No		South Dakota Association of Naturopathic Physicians 717 South Duluth Ave Sioux Falls, SD 57104 Contact: Lauri Aesoph, ND - President Phone: (605) 339-9080 Email: aesoph@worldnet.ATT.net
Tennessee	No		
Texas	No		Texas Association of Naturopathic Physicians 325 Roundabout Kerrville, TX 78028 Contact: Candice Jackson, ND Phone: (830) 895-1727 Email: drcanjac@starband.net

## Naturopathic Licensing Jurisdictions in the United States/Canada

U.S. States	Licensing Laws?	Jurisdiction Contact Information	Professional Associations
Utah	Yes	Div. of Occupational & Professional Licensing 160 East 300 South P.O. Box 146741 Salt Lake City UT 84114-6741 Contact: Daniel T. Jones Fax: (801) 530-6511 Phone: (801) 530-6787 E-Mail: <a href="mailto:djones@br.state.ut.us">djones@br.state.ut.us</a> Website: <a href="http://www.dopl.utah.gov/licensing/naturopathy.html">http://www.dopl.utah.gov/licensing/naturopathy.html</a>	Utah Association of Naturopathic Physicians 2186 S. Highland Drive #207 Salt Lake City UT 84106 Contact: Ulrich Knorr - President Phone: (801)474-3684 Email: <a href="mailto:ulixmission.com">ulixmission.com</a>
Vermont	Yes	VT Office of Professional Regulation National Life Building, North, FL2 Montpelier VT 05620-3402 Contact: Loris Rollins Fax: (802) 828-2465 Phone: (802) 828-2191 E-Mail: <a href="mailto:lrollins@sec.state.vt.us">lrollins@sec.state.vt.us</a> Website: <a href="http://vtprofessionals.org/opr1/naturopaths/">http://vtprofessionals.org/opr1/naturopaths/</a>	Vermont Association of Naturopathic Physicians 141 Main St. Montpelier, VT 5602 Contact: Lonlee Schotnebeck, N.D. - President Phone: (802) 860-3366 Email: <a href="mailto:LL@DrLonlee.com">LL@DrLonlee.com</a>
Virginia	No		
Washington	Yes	WA DOH - Naturopathy Program P.O. Box 47869 Olympia WA 98504-7869 Contact: Holly Rawnsley Fax: (360) 236-2406 Phone: (360) 236-4941 E-Mail: <a href="mailto:holly.rawnsley@doh.wa.gov">holly.rawnsley@doh.wa.gov</a> Website: <a href="https://forless.wa.gov/doh/hpps1/hps7/naturopathy/default.htm">https://forless.wa.gov/doh/hpps1/hps7/naturopathy/default.htm</a>	Washington Association of Naturopathic Physicians 9500 Roosevelt Way NE Suite 300C Seattle, Washington 98115 Contact: Kasra Pourmadel - President Phone: (206)547-2130 Email: <a href="mailto:executive@wanp.org">executive@wanp.org</a> Website: <a href="http://www.wanp.org">http://www.wanp.org</a>
West Virginia	No		
Wisconsin	No		Wisconsin Naturopathic Physicians Association PO Box 2623 Madison, WI 53703 Contact: Jill Evenson, N.D. Phone: (608) 880-8672 Website: <a href="http://www.wisconsin-nd.org">http://www.wisconsin-nd.org</a>
Wyoming	No		
District of Columbia	Yes	Health Licensing Specialist 717 14th Street, N.W. Suite 600 Washington DC 20005 Contact: James Granger Fax: (202) 727-8471 Phone: (202) 724-8755 Email: <a href="mailto:james.granger@dc.gov">james.granger@dc.gov</a> Website: <a href="http://www.hpls.doh.dc.gov/hpla/cwp/view,a,1195,q,494455.asp">http://www.hpls.doh.dc.gov/hpla/cwp/view,a,1195,q,494455.asp</a>	District of Columbia Association of Naturopathic Physicians 4801 Connecticut Ave. NW #6 Washington, DC 20008 Contact: Andrea Sullivan, ND - President Phone: (202) 244-4545 Email: <a href="mailto:drespirtu@aol.com">drespirtu@aol.com</a>
Puerto Rico	Yes	Junta Examinadora Doctores in Naturopatia c/o Myriam Plaza Cell Box 10200 San Juan PR 00908 Contact: Efraim Rodriguez Malave, N.D. Phone: (787) 751-4662 Email: <a href="mailto:eframr@canbe.net">eframr@canbe.net</a>	



## Naturopathic Licensing Jurisdictions in the United States/Canada

U.S. States	Licensing Laws?	Jurisdiction Contact Information	Professional Associations
U.S. Virgin Islands	Yes		
National Association	N/A	N/A	American Association of Naturopathic Physicians 4435 Wisconsin Avenue, NW, Suite 403 Washington, DC 20016 Phone: (866) 538-2267 Fax: (202) 237-8152 Email: member.services@naturopathic.org Website: <a href="http://www.naturopathic.org">http://www.naturopathic.org</a>
Canadian Provinces/Territories			
Alberta	No		Alberta Association of Naturopathic Practitioners P.O. Box 21142 865-8th St. S.W. Calgary, AB T2P 4H5 Contact: Mike Nowazak - President Phone: (780) 905-1930 Fax: (780) 462-0153 Email: <a href="mailto:mike.nowazak@gmail.com">mike.nowazak@gmail.com</a> Website: <a href="http://www.naturopathic-alberta.com/">http://www.naturopathic-alberta.com/</a>
British Columbia	Yes	College of Naturopathic Physicians of BC 1698 W. 6th Ave. Vancouver BC V6J 1R3 Contact: Debbie Ferreira Fax: (604) 688-8476 Phone: (604) 688-8236 E-Mail: <a href="mailto:offices@cnpsc.bc.ca">offices@cnpsc.bc.ca</a> Website: <a href="http://www.cnpsc.bc.ca">http://www.cnpsc.bc.ca</a>	BC Naturopathic Association 2238 Pine Street Vancouver, BC, V6J 5G4 Phone: (604) 277-1128 Fax: (604) 736-6048 Email: <a href="mailto:bcna@bcna.ca">bcna@bcna.ca</a> Website: <a href="http://www.bcna.ca/index.html">http://www.bcna.ca/index.html</a>
Manitoba	Yes	Manitoba Naturopathic Association P.O. Box 2339 Station Main Winnipeg, Manitoba R3C 4A6 Contact: Dr. Cory Storm, N.D. Fax: (204) 452-7044 Phone: (204) 947-0381 E-Mail: <a href="mailto:info@mbnd.ca">info@mbnd.ca</a> Website: <a href="http://www.mbnd.ca">http://www.mbnd.ca</a>	
New Brunswick	No		New Brunswick Association of Naturopathic Doctors c/o Crystal Charest Westview Chiropractic Health Centre 11 King Street Miramichi NB E1N 2M9 Phone: (506) 773-5053 Fax: (506) 773-5056 Email: <a href="mailto:crystalcharest@hotmail.com">crystalcharest@hotmail.com</a> Website: <a href="http://www.nband.ca">http://www.nband.ca</a>
Newfoundland/ Labrador	No		Newfoundland and Labrador Association of Naturopathic Doctors Email: <a href="mailto:natpathist@yahoo.ca">natpathist@yahoo.ca</a>
Northwest Territories	No		

## Naturopathic Licensing Jurisdictions In the Unites States/Canada

U.S. States	Licensing Laws?	Jurisdiction Contact Information	Professional Associations
Nova Scotia	No		<p>Nova Scotia Association of Naturopathic Doctors                      c/o Wolfville Naturopathic Clinic                      189 Dykeland Street, Suite 3                      Wolfville, N.S. B4P 1A3                      Phone: (902) 542-5560                      Fax: (902) 542-4554                      Email: wolfvillenaturopath@hotmail.com                      Website: <a href="http://www.nsand.ca">http://www.nsand.ca</a></p>
Nunavut	No		
Ontario	Yes	<p>Board of Drugless Therapy - Naturopathy                      112 Adelaide St., East                      Toronto ON M5C 1K9                      Contact: Lyle Clark                      Fax: (416) 866-2175                      Phone: (416) 866-8383                      E-Mail: <a href="mailto:office@bddtn.on.ca">office@bddtn.on.ca</a>                      Website: <a href="http://www.boardofnaturopathicmedicine.on.ca">http://www.boardofnaturopathicmedicine.on.ca</a></p>	<p>The Ontario Association of Naturopathic Doctors                      789 Don Mills Rd., Suite 603                      Toronto, ON                      M3C 1T5                      Phone: (877) 628-7284                      Fax: (416) 233-2924                      Email: <a href="mailto:info@oand.org">info@oand.org</a>                      Website: <a href="http://www.oand.org/">http://www.oand.org/</a></p>
Prince Edward Island	No		<p>Prince Edward Island Association of Naturopathic Doctors                      Email: <a href="mailto:drkali@pei.sibn.com">drkali@pei.sibn.com</a></p>
Quebec	No		<p>Quebec Association of Naturopathic Medicine                      1173 Boul.                      Mont-Royal Montreal                      QC H2V 2H6                      Contact: Stephanie Ogura, ND - Vice President                      Phone: (514) 279-6629                      Fax: (514) 279-0111                      Email: <a href="mailto:sogura@sympatico.ca">sogura@sympatico.ca</a>                      Website: <a href="http://www.qanm.org/index.html">http://www.qanm.org/index.html</a></p>
Saskatchewan	Yes	<p>Saskatchewan Association of Naturopathic Practitioners                      102 - 610 Queen Street                      Saskatoon SK S7K 0M8                      Contact: Kent Bailey, N.D.                      Fax: (306) 955-7715                      Phone: (306) 955-7707                      E-Mail: <a href="mailto:infodesk@sarp.ca">infodesk@sarp.ca</a>                      Website: <a href="http://www.sarp.ca">http://www.sarp.ca</a> ☐</p>	
Yukon	No		
National Association	N/A	N/A	<p>Canadian Association of Naturopathic Doctors                      1255 Sheppard Ave. E.                      Toronto, Ontario, Canada, M2K 1E2                      Phone: (800) 551-4381                      Fax: (416) 496-8634                      Website: <a href="http://www.cand.ca">www.cand.ca</a> ☐</p>

**Minority Report  
of the  
Special Commission on Complementary  
and  
Alternative Medical Practitioners**

**A Report to the Legislature  
January, 2002**

## Executive Summary

The Special Commission on Complementary and Alternative Medical Practitioners was established, at the request of naturopaths (practitioners of "natural medicine"), by an outside section of the fiscal 2000 state budget. Although the Commission's name suggests a more general charge, its work was largely confined to a single task: consideration of state licensing for naturopaths. During the course of a year, naturopaths failed to make a persuasive case for the quality of their educational experience, the efficacy of their treatments, the accuracy of their diagnoses, or the rational basis of their beliefs. Skeptics provided extensive materials, including a Massachusetts based, peer-reviewed study of naturopathic opinions, comprehensive governmental documents on naturopath licensing, and a comprehensive review of naturopathy literature. All of these demonstrate the futility of the case for the licensing of naturopaths.

We, the undersigned, therefore register our opposition to the proposed licensure of naturopaths in the Commonwealth of Massachusetts, and to the establishment of any self-regulating board of "naturopathic medicine." The Commission heard overwhelming evidence that an endorsement of naturopaths through licensure would pose a clear threat to public health and safety. No scientific evidence was presented supporting naturopathic claims, but ample evidence was presented to show that these claims are implausible and dangerous. No evidence was presented to justify distinguishing the small group of naturopaths represented on the Commission from other, "less educated" naturopaths. Finally, the pro-licensure report fails to consider the Arizona report described below, which illustrates that a self-regulation statute cannot result in meaningful regulation and public protection in a field that is inherently irrational and unethical.

The signatories of this report have compiled this brief to reflect the evidence presented to the Commission and to fulfill the charge that the legislature presented to the Commission. We urge readers of this summary also to review the extensive background materials attached to it. Any objective reviewer will find that the evidence is fair and comprehensive, and leads inexorably to the conclusion that naturopaths are not qualified to be licensed health care providers.

**Majority Report  
of the  
Special Commission on Complementary  
and  
Alternative Medical Practitioners**

**A Report to the Legislature  
January, 2002**



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## **EXECUTIVE SUMMARY**

In 2000, the Massachusetts Legislature established a special commission to study the use of and need for licensing complementary and alternative medical practitioners in Massachusetts. This study was to identify the various forms of complementary alternative medical practices that exist in Massachusetts, estimate the level of usage and availability of third party reimbursement, and identify those types of practices that are appropriate for state regulation and/or licensure. The study was also to include recommendations on possible regulation and/or licensure specifically for naturopathic doctors.

Due to time constraints, the Commission focused its deliberations solely on naturopathic medicine. This report provides a review of naturopathic medicine, describes the therapies involved, and outlines issues related to education and training standards, scope of practice and regulation. The report outlines regulatory approaches, and makes recommendations on some general principles for licensing naturopathic doctors in the Commonwealth.

### **Summary of Recommendations for Regulation of Naturopathic Doctors**

After careful consideration of all of the information and evidence presented, the majority of the Commission has concluded that state licensure of practitioners of naturopathic medicine is both appropriate and necessary for the protection of the public health, safety and welfare.

Based upon the evidence presented, the majority has found (1) at least some of the diagnostic and therapeutic modalities currently employed in the practice of naturopathy may result in direct patient harm if they are not used safely and prudently, and (2) safe use of the modalities in naturopathy requires learned skills and/or systematic training. The Commission also found that clinical evidence to support efficacy of naturopathic treatment is very limited. However, a majority of Commission members are persuaded that at least some forms of treatment—such as the use of ginkgo, saw palmetto, St. John's wort, horse chestnut, kava kava, and cranberry juice—have merit in treating certain medical conditions. At the same time, a minority of members is not convinced that current evidence supports the efficacy of naturopathic medicine.

Finally, it was also clear to Commission members that consumers would benefit from government clarification of minimum standards of professional qualifications and practice in this field. While the number of practitioners in this field is currently relatively small, it is evident that public interest in various forms of complementary or alternative health care is growing rapidly. Given this and the historical precedent of medical research institutions to become interested in certain "natural" remedies, the majority believes that the number of practitioners can be expected to grow to meet increasing market demand for these services.

In developing its recommendations, the Commission was mindful of the principle that, unless it can be shown that a particular form of health care service poses a demonstrable and unacceptable risk of injury or harm, a consumer should be free to make informed choices about his or her health care services. Currently, naturopaths are able to receive their education through various means such as naturopathic universities, correspondence programs, and in-the-field apprenticeships. The Commission thought it appropriate to distinguish between the different levels of education and of obtaining status as a naturopathic doctor by recommending specific requirements for licensure while not prohibiting the general practice of naturopathy by those who do not hold a license. A consumer will be more informed knowing that a person calling him/herself a naturopathic doctor has met the Commonwealth's requirements for licensure, and therefore has been compelled to demonstrate that he or she possesses a certain basic level of knowledge and skill in the field. At the same time, he or she still has the freedom to choose naturopathic services provided by an unlicensed practitioner. Hence, the recommendations presented below have attempted to recognize the diversity of philosophy and practice that exists among practitioners of naturopathic health care while ensuring a minimum level of protection of the public interest.

Following are the summary recommendations for regulating naturopathic doctors. Part IV of this report provides a more thorough discussion of each recommendation.

1. Enact licensing legislation for naturopathic doctors that vests the power to license and regulate such practitioners in a board to be comprised of nine members, including four naturopathic medical doctors, professionals from other health care fields and a public member.
2. Licensing legislation for naturopathic practitioners should take the form of a "title protection" statute, as opposed to a so-called "practice" act. Title protection ensures that those individuals who are licensed abide by the practice standards established by the act and would allow the board to suspend, revoke or otherwise discipline a licensee who violates those standards or regulations.
3. Licensing legislation for naturopathic doctors should contain specific provisions which prohibit unlicensed individuals from using any of the following terms or titles: "naturopathic physician", "naturopathic doctor", "doctor of naturopathy", "N.D.", "naturopathic medicine", "naturopath", or any term that indicates or implies that he or she has been licensed or otherwise approved to practice any form of naturopathic health care by any governmental body. The Commission further recommends that the term "physician" and "primary care" be reserved for medical doctors and that licensed naturopathic doctors be prohibited from using those terms.
4. The definition of the scope of practice of naturopathic medicine should include many of the practices and treatments being taught at naturopathic medical schools yet exclude certain

practices—such as surgery and the prescribing of controlled substances—as beyond the scope of naturopathic medicine (see Part IV for more detail).

5. The naturopathic licensing board, in consultation with the Department of Public Health and the Board of Registration in Medicine, should promulgate regulations to establish standards for required collaboration between naturopathic doctors and conventional medical doctors.

6. The naturopathic licensing board should promulgate ethics regulations that would reduce the potential for conflict-of-interest, prohibit false and misleading claims, and provide for adequate disclosure of a patient treatment plan and obtain informed consent before treatment (see Part IV for more detail.)

7. Applicants for licensure as naturopathic practitioners shall possess a baccalaureate degree or its equivalent, as determined by the board, and shall have attended and graduated from a four-year doctoral program that is accredited or is a candidate for accreditation by an accrediting agency recognized by the U.S. Department of Education. The naturopathic doctoral program shall further be accredited or be a candidate for accreditation by the Council on Naturopathic Medical Education, or its successor. The naturopathic licensing board shall also have the authority to approve candidates for licensure who are graduates of naturopathic medical schools in countries or territories outside of the United States that offer equivalent training and education.

8. The naturopathic licensing board should establish a minimum 1,200 hours clinical training requirement, prior to graduation from a doctoral program, as a prerequisite for licensure. The clinical training may take place in both outpatient and inpatient settings, and may include components from conventional medicine as well as naturopathic medicine.

9. Applicants for licensure should be required to take and pass a uniform, proctored, psychometrically sound examination in order to obtain a license to practice as a naturopathic practitioner. This examination should, in particular, test the diagnostic and therapeutic skills of the applicant. The Commission supports the adoption of a standard national examination.

10. Licensing legislation for naturopathic doctors should contain specific continuing education requirements that must be met in order to renew that license.

11. Licensing legislation for naturopathic doctors should grant broad authority to the licensing board to develop and implement any regulations necessary to protect the public health, safety and welfare.

12. Licensing legislation for naturopathic doctors should contain specific grounds for

**taking disciplinary action against providers who engage in certain forms of professional misconduct and violations of regulations of the board.**

**13. The naturopathic licensing board should establish a list of prohibited practices and treatments where controlled clinical trials have demonstrated a lack of efficacy or a risk of harm. The Commission also recommends that the legislature establish a list of prohibited practices for those practitioners who do not fall under the terms of this proposed act. The Commission further recommends that the naturopathic licensing board, in collaboration with the Department of Public Health and the Office of Consumer Affairs and Business Regulation, review annually research reported or conducted by the National Center for Complementary and Alternative Medicine of the National Institutes of Health and other CAM centers.**



# **Naturopathy: A Monograph**

**Prepared by Kimball C. Atwood, M.D.,  
Representative of the Massachusetts Medical Society, for the  
Massachusetts Special Commission on  
Complementary and Alternative Medical Practitioners  
April, 2001**

## **Executive Summary**

A small group of naturopaths (practitioners of "natural medicine"), who refer to themselves as "naturopathic physicians" or "naturopathic doctors" ("ND's"), seeks licensure in the Commonwealth of Massachusetts. These naturopaths portray themselves as "primary care physicians." They are few by any standard, numbering approximately 1500 in the entire U.S. and 30 in Massachusetts (by comparison, in Massachusetts alone there are about 30,000 medical doctors, 4,000 nurse practitioners, 400 nurse midwives, and 1800 chiropractors). They contrast themselves to other naturopaths, whom they consider not worthy of licensure, by virtue of having attended on-campus schools. These schools are not accredited in any meaningful way. They grant the "N.D." degree, but so do several other, "unapproved," correspondence schools. The N.D. degree is not recognized nationally or in the Commonwealth of Massachusetts.

Licensure offers regulation to protect the public. Regulators must hold health professions to a very high standard, since considerable damage can occur as a result of treatment by incompetent practitioners. To be considered a *health* profession, an occupation must be able to demonstrate an objective, scientific, and ethical basis. Naturopathy fails to meet this standard.

For an occupation with little semblance of objective, scientific, and ethical bases, licensure legitimizes an otherwise illegitimate and dangerous activity. This monograph demonstrates, unequivocally and with extensive documentation, that naturopathy is a dangerous activity, and that no amount of regulation is likely to mitigate this fact. It is the opinion of the Massachusetts Medical Society that it would be irresponsible and unconscionable for the Commission to recommend the licensure of naturopathy in the Commonwealth of Massachusetts. Among the reasons are:

1. Naturopathy is both potentially and actually injurious when practiced according to the accepted standards of the profession. This injury is likely to be due to the failure of the naturopathic practitioner to recommend appropriate medical treatment. The discussion includes several clinical examples and one clinical study supporting these assertions (pp. 6-8, 22-43).

2. Unscientific naturopathic beliefs pose irrational challenges to proven public health measures, most notably childhood immunizations (p.40).
3. Irrational, unscientific beliefs and practices abound in naturopathy, likening it more to a cult than to a valid form of health care. These beliefs and practices are not merely at the fringes but are the standards of the field. They are advocated by the leaders themselves (pp.6-8 and most of the discussion).
4. Naturopathic practitioners are incapable of self-regulation commensurate with public safety. The question of protecting the public from "less qualified" naturopaths is demonstrated to be moot. Ample evidence is offered throughout the discussion (see, esp., pp. 33, 44).
5. Naturopaths prescribe numerous "natural medicines" with a standard for safety and efficacy that is unacceptably low, as evidenced by the leading textbook in the field (pp. 13-18 and Appendix I).
6. The scientific pretensions of naturopathy and naturopathic training programs are baseless. There is ample evidence that the basic science courses do not teach students to think critically (p.9). Research performed at naturopathic colleges is lacking in scientific rigor and has not investigated common naturopathic claims (p.11). The libraries at naturopathic colleges are filled with books and journals that promote trendy but implausible notions regarding health care (p.10). The major journal in the field is filled with articles that are both absurd and dangerous (p.12). The oft-repeated claim that the major textbook in the field cites "more than 10,000 scientific references" is a misrepresentation, as exemplified by the textbook's claims for "natural remedies" (pp.12, 13-16 and Appendix I).
7. Collaboration with medical doctors is uncommon in naturopathic practice, in contrast to what the Commission was told by naturopathic representatives. Statistics are cited (p.43).
8. There is a financial conflict of interest built into naturopathic practice that is both sanctioned and shared by the very organization that should be providing ethical guidance (p.18).
9. There are many nonsensical diagnostic practices, some of which are "electrodiagnosis," "applied kinesiology," hair analysis, and "iridology," that are correctly viewed as quackery when offered by a medical doctor but are standard for naturopathic practice (pp. 22-26).
10. There are ubiquitous claims of dubious clinical "syndromes." among which are multiple "food allergies," "toxemia," and chronic yeast infections, which cast further doubt on the science and ethics of naturopathic practice (pp. 26-33).
11. The duration and setting of naturopathic clinical training, even overlooking its content, is inadequate to the task of producing competent primary care physicians. This is clear from a comparison of the training of medical doctors to that of naturopaths. Just as a newly graduated medical doctor, no matter how well-intentioned, would not be allowed to assume the role of a primary care physician, neither should this be allowed for a naturopath whose training is, clearly, inferior (pp.43-44).

**This monograph also addresses the issue of why it might seem to some people, including naturopathic practitioners themselves, that naturopathy "works" (p.45).**

7



## Why Naturopaths Should Not Be Licensed

Kimball C. Atwood IV, M.D.

Naturopaths are licensed as independent practitioners in eleven states (Alaska, Arizona, Connecticut, Hawaii, Maine, Montana, New Hampshire, Oregon, Utah, Vermont, and Washington) and the District of Columbia, and can legally practice in a few others. Naturopaths who have attended on-campus schools are pressing for licensure in the remaining states.

Approximately 30 naturopaths are lobbying for licensure in Massachusetts. They portray themselves as "primary care physicians," consider themselves superior to other naturopaths whose "degrees" were obtained from nonaccredited correspondence schools, and assert that licensure is needed to protect the public from unqualified practitioners. However, the existing naturopathic licensing agencies have done little or nothing to protect the public from naturopathy's widespread quackery.

Since treatment by incompetent practitioners can cause great damage, health professions should be held to very high standards. To be considered a health profession, an occupational group should be able to demonstrate an objective, scientific, and ethical basis. Naturopathy fails to meet this standard. I believe that it is dangerous and that no amount of regulation can control the danger. Moreover, as noted by William T. Jarvis, Ph.D., past-president of the National Council Against Health Fraud:

The difference between more and less educated naturopaths is . . . like comparing more and less educated witch doctors. It could actually be argued that less schooled naturopaths are safer because they may have a smaller bag of tricks and, because they don't consider themselves "primary health physicians," they are more apt to refer patients to M.D.'s for additional care.

The Massachusetts Medical Society strongly opposes naturopathic licensure in Massachusetts. Our reasons include:

- Naturopathy is both potentially and actually injurious when practiced according to the accepted standards of the profession. This injury is likely to be due to the failure of the naturopathic practitioner to recommend appropriate medical treatment.
- Unscientific naturopathic beliefs pose irrational challenges to proven public health measures, most notably childhood immunizations.
- Irrational, unscientific beliefs and practices abound in naturopathy, likening it more to a cult than to a valid form of health care. These beliefs and practices are not merely at the fringes but are the standards of the field. They are advocated by the leaders themselves.
- Naturopathic practitioners are incapable of self-regulation commensurate with public safety. No study has demonstrated that naturopaths who attend full-time schools are any less dangerous than those who have mail-order degrees.
- Naturopaths prescribe numerous "natural medicines" with a standard for safety and efficacy that is unacceptably low, as evidenced by the leading textbook in the field.
- The scientific pretensions of naturopathy and naturopathic training programs are baseless. There is ample evidence that the basic science courses do not teach students to think critically. Research performed at naturopathic colleges is lacking in scientific rigor and has not investigated common naturopathic claims. The libraries at naturopathic colleges are filled with books and journals that promote trendy but implausible notions regarding health care. The major journal in the field is



filled with articles that are both absurd and dangerous. The oft-repeated claim that the major textbook in the field cites "more than 10,000 scientific references" is a misrepresentation, as exemplified by the textbook's claims for "natural remedies."

- Collaboration with medical doctors is uncommon in naturopathic practice.
- Naturopathy involves many nonsensical diagnostic practices that mainstream medicine considers quackery but naturopaths consider standard.
- There are ubiquitous claims of dubious clinical "syndromes," among which are multiple "food allergies," "toxemia," and chronic yeast infections, which cast further doubt on the science and ethics of naturopathic practice.
- The duration and setting of naturopathic clinical training, even overlooking its content, is inadequate for producing competent primary care physicians. This is clear from a comparison of the training of medical doctors to that of naturopaths. Just as a newly graduated medical doctor, no matter how well-intentioned, would not be allowed to assume the role of a primary care physician, neither should this be allowed for a naturopath whose training is clearly inferior.

Naturopathic services are not covered by Medicare or most insurance policies. Expansion of naturopathic licensing will make naturopaths appear more legitimate and could help them gain passage of laws forcing insurance companies to cover their services.

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Dr. Atwood, who practices in Newton, Massachusetts, is board certified in anesthesiology and internal medicine. He is also his state medical society's representative on the Massachusetts Special Commission on Complementary and Alternative Medical Practitioners, an ad hoc group whose purpose is to inform state legislators about naturopathy. This article is modified from a lengthy report that Dr. Atwood submitted to the Commission.

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This article was revised on December 30, 2001.

## **Naturopathic Misrepresentations**

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The Massachusetts Special Commission on Complementary and Alternative Medical Practitioners met from October 2000 until January 2002. Its purpose was to study the request of a group of naturopaths to achieve licensure as health care providers in the Commonwealth of Massachusetts. These naturopaths call themselves "naturopathic physicians" or "doctors" and are represented by their national organization, the American Association of Naturopathic Physicians (AANP). They have attended one of four on-campus schools in the U.S. (Bastyr University, the National College of Naturopathic Medicine, the Southwest College of Naturopathic Medicine, and the University of Bridgeport College of Naturopathic Medicine) or the Canadian College of Naturopathic Medicine. This training, they maintain, is superior to that of other naturopaths and makes them worthy of recognition by state health regulators. The evidence brought to bear during the deliberations of the Special Commission suggests otherwise.

The Commission comprised twelve members: three physicians, six legislators (of whom three were predisposed to favoring licensure for naturopaths), a naturopath, a representative of a group of acupuncturists, and the chairman of the Massachusetts Division of Professional Licensure. Upon its adjournment, six Commissioners favored naturopathic licensure, three opposed, and three abstained.

The following document in slightly different form was included in the materials sent to the state legislature by the Commission upon its adjournment. Also included were the commission's Report in Opposition to the Licensure of Naturopaths, co-authored by William J. Ryder, Esq., and me; the Naturopathy Monograph by me; and the Commission's report in favor of the licensure of naturopaths. That pro-licensure report is notable for its lack of discussion of naturopathic practices, confining its content to superficial considerations only. As such, it is an example of how the public must be wary of a government commission that might otherwise be assumed to act with integrity.

More troubling is that the pro-licensure report was written with the help of two presumed experts in "Complementary and Alternative Medicine" from Harvard Medical School: Dr. David Eisenberg and Attorney Michael Cohen. Dr. Eisenberg was the official representative of the Mass. Department of Public Health to the Commission, but he failed to disclose several conflicts of interest, including funding by the Southwest College of Naturopathic Medicine, funding by the Fetzer Institute, and funding by the National Center for Complementary and Alternative Medicine, whose advisory board included three naturopaths at the time of the Commission's work.

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### **Revealing Quotations from Leading "Naturopathic Physicians"**

**Kimball C. Atwood, M.D.**

**July 3, 2001**

Virtually every naturopath-patient interaction involves "fraud, deceit or misrepresentation of facts in connection with diagnosis, evaluation or treatment" of that patient. When a naturopath claims that "toxins" or "food allergies" or dietary sugar or "candidiasis" are the underlying causes of ear infections, learning disorders, fatigue, arthritis or numerous other problems, it is a misrepresentation of facts. When a naturopath uses "applied kinesiology" or "iridology" or "electrodiagnosis" or "hair analysis" or "live cell analysis" to make any "diagnosis," it is fraudulent. Whenever a naturopath recommends a "cleansing

program" to treat specific problems, it is a misrepresentation of facts. When a naturopath performs "cranial osteopathy," "binasal specific," "colonic irrigation," or "electrical current in the form of positive galvanism, applied transrectally," that constitutes fraud. When a naturopath tells a patient that it's not necessary to treat strep throat with a genuine antibiotic to prevent rheumatic heart disease, it's a dangerous misrepresentation of facts. Each time that a naturopath claims that "natural antibiotics" such as goldenseal or garlic are adequate substitutes for real ones, it is an example of fraud. Almost all examples of naturopaths recommending "natural medicines," which are either known to be ineffective, are unlikely to be effective, or have yet to be studied, are fraudulent. Each time a naturopath sells her own "natural medicines" to a patient by claiming that they are preferable to what can be purchased on the open market, it constitutes deceit. Every instance of a naturopath warning a parent against childhood immunizations is a misrepresentation of facts.

There are numerous other examples, all of which are representative of the consensus of naturopathic practice as shown in the American Association of Naturopathic Physicians (AANP) Position Papers, the *Textbook of Natural Medicine*, the *Journal of Naturopathic Medicine*, the curricula of all four full-time naturopathic schools, and many other sources in the field. These are not merely the exceptional practices of a few mavericks; they are the standards of the field. This is why any proposal for self-regulation is ill-founded and doomed to failure. The regulatory board envisioned by the pro-licensure report couldn't possibly be expected to discipline its constituents for these frauds, deceptions, and misrepresentations of facts. On the contrary, the board would consider such practices to be legitimate. The entire enterprise would go largely unnoticed until a few real tragedies had occurred.

Here are several quotations from mainstream naturopathic sources and critics, covering various health problems, each of which illustrates fraud, deceit, or misrepresentation of facts (all Web sites accessed between December 2000 and July 2001):

### **ADD**

[An Alternative to Ritalin: Homeopathy as a Highly Effective Treatment for ADD. Judyth Reichenberg-Ullman N.D., M.S.W., DHANP]

Comment: Homeopathy has no specific effects on any disease, because the preparations contain no active ingredients. Any apparent effect is due to well-understood phenomena that are common to all patient-practitioner interactions and are the basis for most "alternative" claims. See p. 45 of the *Naturopathy Monograph* for further discussion. Judyth Reichenberg-Ullman is a "former instructor and currently occasional lecturer at Bastyr University, the National College of Naturopathic Medicine (Portland), and the Southwest College of Naturopathic Medicine (Phoenix)."

### **AIDS**

"The greatest promise of St. John's wort, however, may be in the treatment of AIDS." [Pizzomo JE and Murray MT (eds.). *Textbook of Natural Medicine*, Churchill Livingstone, Edinburgh, 1999. p. 803]

Comment: St. John's wort is dangerous for HIV+ patients taking protease inhibitors and has no known value in fighting the HIV itself.

"Electrochemical Ag+ solutions exhibit antimicrobial effectiveness." justification for recommending colloidal silver as a treatment for opportunistic infections in patients with AIDS [*Textbook of Natural Medicine*, p. 1292]

**Comment:** Colloidal silver is a poisonous heavy metal. The FDA has declared it unsafe for any medicinal use.

### **Allergies**

"It is important to remember that the overload of the foreign substances 'attacking' our body and the increased permeability of the mucous membranes create the vicious cycle where they both feed each other. If this situation continues for a long period of time, the person is very likely to become allergic to almost everything, as he/she is no longer capable to prevent foreign substances from entering his/her system." [Bubis, E. Allergies from the Naturopathic Angle. Available at the [Naturopathic Medicine Network](#)]

**Comment:** This is completely false. The author has an office in the Boston area.

### **Alzheimer's disease**

"Hair tests should be performed upon diagnosis to determine if the patient is lacking any vital minerals or vitamins." [[Treatise on Alzheimer's disease](#) from the Southwest College of Naturopathic Medicine]

**Comment:** Hair tests are useless for the diagnosis of vitamin and mineral deficiencies, and are a well-known form of quackery (see: [Hair Analysis: A Cardinal Sign of Quackery](#)). The Southwest College of Naturopathic Medicine provides funds for the Harvard Complementary and Integrative Medicine Course, whose director is David Eisenberg, M.D., the representative of the DPH to the Special Commission on Complementary and Alternative Medical Practitioners.

### **Arthritis**

"Daily bowel movements are essential for the elimination of waste products, which aggravate the inflamed joints.

Acupuncture has proven very effective in treating arthritis. You may want to look for a licensed acupuncturist in your area.

From the following homeopathic medicines, choose the one that best matches your symptoms." [Ruth Bar-Shalom, N.D. and David Soileau, N.D. [Osteoarthritis](#)]

**Comment:** The first claim is just silly. Daily bowel movements have nothing to do with osteoarthritis, and "waste products" in the bowel do not affect joints in any way. Acupuncture has been disappointing in the treatment of arthritis (see, for example: Ernst E. Acupuncture as a symptomatic treatment of osteoarthritis. A systematic review. *Scand J Rheumatol* 1997;26(6):444-7). Homeopathy has no effect on arthritis or any other disease. The authors of the quotations above are frequent contributors to the treatises on the AANP website.

### **Asthma**

"Some doctors recommend taking baths with a cup or so of 3% hydrogen peroxide in the water to bring extra oxygen to the entire surface of the skin, thus making the lungs somewhat less oxygen hungry. This method can be performed preventively. Another technique for an acute attack is to drink some hot water



with the juice of one clove of garlic."

"Often the upper thoracic vertebrae will be out of alignment after an asthma attack, which will ultimately put pressure on the lungs and possibly precipitate another attack." [Kane, E. Asthma]

Comment: This article is filled with dangerous nonsense that is in conflict with the facts of anatomy, physiology, pharmacology and clinical medicine. Its author, Emily Kane, is listed as a senior editor of the *Journal of Naturopathic Medicine*, the "official publication of the American Association of Naturopathic Physicians."

## Cancer

"Even the mainstream advice for preventing cancer is largely nutritional, and naturopaths have treated cancer successfully before it becomes too acute" [Naturopathy: An age-old medicine for the "New Age," by Susan M. Fitzgerald, Communications Coordinator, National College of Naturopathic Medicine, Portland, Oregon]

Comment: There is no evidence for either of these claims.

"So, what can I do to lower my risk of getting breast cancer? Keep your breasts happy and healthy. Love them and yourself. We often develop illnesses because of our own unresolved feelings and lack of love for ourselves." [Preventing breast cancer. Judyth Reichenberg-Ullman N.D., M.S.W., DHAN]

Comment: There is no evidence that breast cancer or any other form of cancer is caused by "unresolved feelings." This is an irresponsible claim that can only add insult to injury for a patient with a life-threatening illness. The author of this article is a "former instructor and currently occasional lecturer at Bastyr University, the National College of Naturopathic Medicine (Portland), and the Southwest College of Naturopathic Medicine (Phoenix)."

"Gerson Therapy is a very powerful healing approach to dealing with cancer, multiple sclerosis and other chronic degenerative diseases and embodies the principles of nature cure [sic]." [Announcement of a lecture to be given at the National College of Naturopathic Medicine: "Upcoming Events Schedule, Fall 2000]

Comment: Gerson Therapy is an absurd, long-since discredited cancer treatment that includes "detoxification" with coffee enemas, ozone enemas, massive quantities of juices made from fruits, vegetables, and raw calves' livers, and other arduous regimens. The treatment bears no relation to anything that is known about cancer or any other disease, and is itself toxic. The lecturer was Anna MacIntosh, NCNM Dean of Research, who is also a member of the National Advisory Council for Complementary and Alternative Medicine.

"It is now relatively well accepted that vitamin C protects humans from stomach cancer." [Steve Austin, N.D. Linus Pauling and Vitamin C therapy for breast cancer]

Comment: This claim is false. The author, who makes numerous other unsubstantiated claims about cancer and "dietary supplements," is a "former professor of nutrition at National College of Naturopathic Medicine, [and] currently on the faculties of Southwest and Canadian Colleges of Naturopathic Medicine."

"In November 1998, then 67-year-old Dolores Lawrence of Kissimmee, Fla., was diagnosed with breast



cancer that had spread to her liver. Her grandson recommended a call to [a naturopath in Lexington, MA], who requested copies of her lab results. By December 1998, she was on a regimen of chemotherapy, vitamins, and herbs, a combination she credits with her cancer's remission since the fall of 1999.

"Don't let anyone tell you that you're going to die," said Lawrence. "Whatever you have to do, whatever it costs, your life is absolutely worth it."

"According to [the naturopath], office visits cost about the same as those charged by conventional physicians. Beyond that, naturopathic treatments can run anywhere from no charge, if just dietary changes are necessary, to \$500 per month for some cancer patients. Lawrence, who has never met [the naturopath], pays for her telephone consultations and prescribed supplements with the help of her two daughters.

"A lot of patients, especially those with cancer, come in after they've been told there's nothing else conventional medicine can do for them. I could help so much more if they'd come to me sooner," he said. "It's frustrating to hear they didn't know there was another option." [Beyond the Conventional: Naturopaths say they treat whole person rather than suppress symptoms, by Cynthia Cantrell, Boston Globe.]

Comment: This article is a series of testimonials, which have long been understood by rational physicians to be unhelpful in determining the efficacy of treatments. The excerpt shows how a desperate cancer patient can fall prey, both financially and emotionally, to the untested claims of "alternative" practitioners. The naturopath, who practices in the Boston area, is reported to be treating the patient over the phone without ever having met her. This is a fundamental breach of medical ethics, and would subject the practitioner to disciplinary measures if he were a medical doctor.

### **Childhood Vaccinations**

"A good case of smallpox may rid the system of more scrofulous, tubercular, syphilitic and other poisons than could otherwise be eliminated in a lifetime. Therefore, smallpox is certainly to be preferred to vaccination. The one means elimination of chronic disease, the other the making of it." [Harry Riley Spittler, *Basic Naturopathy: a textbook* (n.p.: American Naturopathic Association, Inc., 1948), p. 214. This book was submitted to The U. S. Public Health Service in 1968 as a part of the report from the National Association of Naturopathic Physicians (later to become the AANP). Quoted in the HEW report on naturopathy, available on Quackwatch.

In 1981 a study of naturopaths in Washington found that "many were opposed to routine immunization because they felt the procedure was unnatural, unnecessary and elitist." [Ernst E. *The Attitude Against Immunisation within Some Branches of Complementary Medicine*. *European Journal of Pediatrics* (1997) 156:513-516]

"Some naturopaths espouse an 'immunization kit' containing homeopathic solutions and pills that supposedly protect against polio, measles, pertussis, tetanus, and other lethal diseases. The Academic Dean of the National College of Naturopathic Medicine, Jared Zeff, N.D., said, in reference to such products, that some naturopaths give conventional vaccines and some give homeopathic pills that 'stimulate the immune system.'" [Butler K. *A Consumer's Guide to Alternative Medicine*. Buffalo, NY. Prometheus Books, 1992. p. 139]

"The fifth [issue], which attacks immunization, contains papers suggesting that vaccines may be a factor in causing cancer and that homeopathic prophylaxis using nosodes would be effective and safer than standard vaccines. (Nosodes are homeopathic products made from pathological organs or tissues: causative agents such as bacteria, fungi, ova, parasites, virus particles and yeast; disease products; or excretions.)" [Review by Stephen Barrett, M.D., of the 1994 issue of the *Journal of Naturopathic Medicine* (the "official publication of the American Association of Naturopathic Physicians").

"Whereas it is well documented that some of the current childhood vaccinations have been associated with significant morbidity and are of variable efficacy and necessity" [Current AANP Position Paper on Childhood Vaccinations]

"In view of the valid questions about the efficacy of modern vaccines and growing concerns about harmful side effects, which appear to be greatly underestimated..."

"When arbitrary decisions in the mandating of vaccines are made by government bureaucracies, which frequently work hand-in-glove with the pharmaceutical industry, with no recourse open to parents, we have all the potential ingredients for a tragedy of historic proportions." [Harold Buttram, MD, author of the chapter on vaccinations in the 1993 edition of the *Textbook of Natural Medicine*, which appeared on the AANP website in 2001]

Comment: The side effects of vaccines are not greatly underestimated. Serious ones are well recognized but very rare, much rarer than the incidence of serious infectious diseases in the absence of vaccines. The naturopathic representative to the Commission denied that present-day naturopaths are opposed to childhood vaccinations. The quotations above, which show a consistent historical pattern, prove otherwise.

### **Depression**

"Depression and fatigue have been linked to food allergies for over 65 years." [*Textbook of Natural Medicine*, p.1046]

"Vitamin C: 3-5 g/day in divided doses." [Recommendation for treatment of bipolar depression in *Textbook of Natural Medicine*, p.1054]

Comment: These claims are false.

### **Diabetes**

"There is increasing evidence that diabetes is both induced and curable by clinical nutrition." Naturopathy: An age-old medicine for the "New Age" by Susan M. Fitzgerald, Communications Coordinator, National College of Naturopathic Medicine, Portland, Oregon

Comment: The statement is a gross distortion, i.e., misrepresentation, of the facts.

"However, there are lots of other ways to control DM (Diabetes Mellitus), including Botanical Medicine with its array of insulin-like plants, Homeopathy, Traditional Chinese Medicine (TCM) and psychological approaches." [Emily Kane, N.D. Adult Onset Diabetes.]

Comment: These claims are false. Only "botanical medicine" has even a theoretical possibility of "controlling diabetes mellitus," but if so it has yet to be discovered. The author of this treatise is listed as a senior editor of the *Journal of Naturopathic Medicine*,

the "official publication of the American Association of Naturopathic Physicians."

### "Electrodiagnosis"

"EAV Screening Device for Sale. Almost new. Increase your revenue while better serving your clients. Test for parasites, food and environmental sensitivities, candida, nutritional deficiencies and much more.

Biopath Listen System using electrodermal screening. A great way to test for allergies of all kinds. Excellent practice builder

Vega Machine For Sale. VegaTest II complete with carrying case, extra hand electrode, instruction manual (Short Manual of VegaTest), test kits and 114 food vials. Remember, Vega units are no longer available in the United States. Save yourself the expense and hassle of importing a Vega unit (and avoid the possibility of having the unit confiscated at the border).

Comment: These ads, culled from many more like them, are from the AANP website "Equipment 4 sale" page. Vega units "may be confiscated at the border" because the FDA has ruled that they are worthless and cannot be legally marketed or imported into the U.S. for diagnostic or treatment purposes. The devices merely measure the skin's resistance to a tiny electric current. Their use is quackery.

### Glaucoma

"of foremost importance in achieving collagen integrity are optimal tissue concentrations of ascorbic acid" (vitamin C). [Recommendation for the treatment of glaucoma in *Textbook of Natural Medicine*. p.1250]

Comment: This claim is misleading unless the patient is suffering from scurvy (due to frank vitamin C deficiency), and it has nothing to do with the pathogenesis of glaucoma. To illustrate this point, consider that water is also "of foremost importance in achieving collagen integrity," but more of it than usual will neither prevent nor treat glaucoma.

### Heart Disease

"If there is significant blockage of the coronary artery, intravenous chelation therapy may be appropriate."

"EDTA chelation therapy is an alternative to coronary artery bypass surgery and angioplasty which may prove to be more effective and is definitely safer and less expensive."

- *Textbook of Natural Medicine*, p.1078, 1082

Comment: Chelation therapy has long been recognized as an implausible, dangerous treatment based on a simplistic misunderstanding of atherosclerosis. A recent review of the entire literature of its use for coronary artery disease, performed by a well-known enthusiast for "alternative medicine," concluded: "The most striking finding is the almost total lack of convincing evidence for efficacy. Given the potential of chelation therapy to cause severe adverse effects, this treatment should now be considered obsolete." (Ernst E. Chelation therapy for coronary heart disease: An overview of all clinical investigations. *Am Heart J*. 2000 Jul; 140(1): 4-5)

"Most drugs prescribed by M.D.'s are intended to impose an external order on the body. In contrast, an N.D.'s goal is not to impose an outside order but to correct the underlying problem. In the case of a weakened heart, an N.D. would accomplish this by using herbs that nourish and strengthen the heart, such as hawthorne berry, or herbs that disperse congestion or toxins in the body, such as dandelion root. When strengthening and detoxification occur, a patient's vitality becomes stronger, the root cause of the illness is addressed, and a permanent recovery becomes possible." [Mary & Michael Morton. "Naturopathic Medicine," from Healthworld Online]

Comment: This quotation is an illustration of the magical thinking that forms the basis of naturopathy.

### **Herbal Medicines**

"If there is any problem with herbal medicines it is that unless one knows how to prescribe them, they may not be effective. Herbal medications should be prescribed based on the symptoms that the person presents rather than for the name of the disease. Herbal medications are much more effective at relieving the patients symptoms when prescribed in this manner. When prescribed the medicines act with the body's own innate healing mechanism to restore balance and ultimately allows healing to occur. What's nice about plant or herbal medicines is that because they are derived from the whole plant they are considerably less toxic to the body. The plant medicine has evolved to work in harmony with the normal body processes rather than taking over its function as many drug therapies do. Because of this herbal medicines may be taken for longer periods of time without the side effects so often experienced with drugs." [Thomas Kruzel, N.D. Multiple Sclerosis and Alternative Medicine]

Comment: The entire paragraph is nonsense. The author is listed as "an Associate Professor of Medicine at National College of Naturopathic Medicine where he teaches Clinical Urology, Geriatric Medicine and Clinical Pathology."

### **High Blood Pressure (Hypertension)**

"Gems that have been reported to be helpful in hypertension are: Sapphire; Coral; Pearl; Pearl, Sapphire, Emerald, Diamond combination; Emerald, Sapphire, Cat's Eye combination

Hypertensive patients are like overreactive sounding boards and often display increased anxiety, inappropriate coping behaviors in socially distressing situations or exaggerated dependency needs." [Emily Kane, N.D. Hypertension]

Comment: These claims are absurd, as are all the rest in this long article. The author is listed as a senior editor of the *Journal of Naturopathic Medicine*, the "official publication of the American Association of Naturopathic Physicians."

### **Infertility**

"Vitamin C supplementation can be very effective in treating male infertility."

- *Textbook of Natural Medicine* p. 1383

"Vitamin C improves sperm motility." [Amy Rothenberg, N.D., in a presentation to the Commission]

Comment: There is no evidence for these claims.

### **Liver Disease**



"Acute hepatitis is one of the easiest diseases for vitamin C to cure." [*Textbook of Natural Medicine* p.1269]

"*Eclipta alba* given 800 mg TID, has been shown to reverse hepatic cirrhosis." [*Clinical Roundtable, J Naturopathic Medicine* vol.1, no.1. available at:

Comment: These claims are entirely false.

### **Multiple Sclerosis**

"Diets low in fats cause the illness to go into remission and the symptoms to diminish. In my opinion, homeopathy is also a cornerstone of treatment for multiple sclerosis along with diet.

Hydrotherapy works because it does several things needed by the MS patient. First, it increases oxygenation in the blood. Because of the higher fat content of the blood in these patients, less oxygen is delivered to the tissues. the process of using hot and cold applications promotes repair of tissue damaged by the disease, thus helping to reverse the damage to the delicate tissues." [Thomas Kruzel, N.D. *Multiple Sclerosis and Alternative Medicine*]

Comment: These claims are false and demonstrate the naïve, naturopathic view of human pathophysiology. The author is listed as "an Associate Professor of Medicine at National College of Naturopathic Medicine where he teaches Clinical Urology, Geriatric Medicine and Clinical Pathology."

### **Obstetrics**

"Naturopathic physicians believe counseling is an important component of their jobs as facilitators for childbirth care. Dr. Zeff says that he requires the mother and partner to invite him and his assistant to dinner."

"N.D.'s use many different treatments during the various stages of gestation and birth, including some that most conventional doctors are unfamiliar with. For instance, some N.D.'s use homeopathy before labor begins to help a breach [sic] baby turn to the correct "head-down" position. In some cases, the homeopathic remedy Pulsatilla is used when the baby is not yet in the right position for delivery. Naturopathic physicians have seen that within twelve hours of giving a dose of Pulsatilla to the mother, the baby turns by itself."

"Also, given that naturopaths are trained in natural childbirth, with their noninvasive and natural treatments, N.D.'s are able to avoid many of the complications associated with childbirth." [Mary & Michael Morton. "*Naturopathic Medicine*," from Healthworld Online

Comment: There are no published data to support these claims. There never will be, because homeopathy is at odds with facts. What would the Board of Registration in Medicine think of a medical doctor who required his patient to invite him to dinner? "Dr. Zeff" is Jared Zeff, the former Academic Dean of the National College of Naturopathic Medicine in Portland, Oregon.

### **Otitis Media (Ear Infection)**

"Yes, bacteria feed on sugar, and if you remove it from a microbiological media, bacteria simply won't



be able grow. By the same logic: reduce the sugar load on the human body, and bacteria will have harder time infecting it."

"Another important factor allowing pathological bacteria to overgrow in our bodies is a weak immune system. Long-term overuse of antibiotics suppresses the immune system."

"From the naturopathic prospective, the single most important thing to understand is that an ear infection itself is a consequence, not a cause. It is a consequence of nutritional imbalances and a weak immune system."

"The above outlined naturopathic approach to otitis media has proven to be very effective and fundamentally curative." [Bubis, E. Why do our children get chronic ear infections? The naturopathic perspective. Available at the Naturopathic Medicine Network]

Comment: Every statement is false. The final one implies that studies of naturopathic treatments for otitis media have been done. They have not. The author is a Boston-area naturopath.

### Preventive Medicine

"I think the best position for N.D.'s is in the family practice [sic],' Dr. Kail says. 'Naturopaths are the only physicians who have primary skills in health/risk analysis and disease prevention.' Kail says some of the benefits of using a naturopathic doctor are safer medicine, quicker recovery time, and, especially, prevention of future illness." [Mary & Michael Morton. "Naturopathic Medicine," from Healthworld Online]

Comment: There is no evidence that naturopaths have esoteric knowledge about disease prevention that is unknown to health care professionals in general. On the other hand, it makes no sense for naturopaths to be opposed to childhood vaccinations, the most effective form of preventive medicine ever devised. Naturopaths have no real skills in disease prevention, but they whimsically believe that "toxins," "food allergies," "chronic candidiasis," dietary sugar, fat and gluten, and a few other entities cause all diseases.

The claim that no other health care professionals have "primary skills in health risks" is ridiculous and fraudulent. One of the most important studies in the field has been the Framingham Heart Study, performed in Massachusetts. There are no naturopaths involved. All modern MD's are trained in disease prevention to the extent that there is real knowledge pertaining to it. Why else would doctors and public health experts be concerned with cholesterol levels, smoking, immunizations, exercise, weight control, pap smears, mammograms, colon cancer screening, rubella screening and prenatal care for expectant mothers, genetic counseling, occupational exposures, environmental lead exposure, water fluoridation, sewage treatment, clean water, and a host of other preventive measures? Naturopaths have had no role whatsoever in developing this knowledge. Nor could they have, because they have never performed scientific studies in public health or any other aspect of medicine, and they have historically rejected immunizations, the germ theory and other rational bases for diseases.

Naturopaths don't offer "safer medicine," except in the sense that most of their "medicines" have no effect at all. Naturopaths pretending to be "family practitioners" are a clear danger to public health. "Dr. Kail" is a member of the National Advisory Council for

## Complementary and Alternative Medicine.

### Schizophrenia

"The hypothesis that gluten is a causative factor in the development of schizophrenia is substantiated by epidemiological, clinical, and experimental studies." [Pizzorno JE and Murray MT. *Encyclopedia of Natural Medicine*. Quoted in Burns K. Causes and Perceptions of Schizophrenia]

Comment: There is no evidence for this claim. Health consumers should be skeptical of authors, such as Pizzorno and Murray, who claim expertise in such disparate matters as schizophrenia, heart disease, gynecology, glaucoma, and "cellulite." This is only possible because of the few simplistic "theories" that naturopaths use to explain all diseases.

### Streptococcal Pharyngitis (Strep Throat) and Rheumatic Heart Disease

"Naturopathic physicians are well trained in the standard clinical and laboratory diagnosis of Strep pharyngitis, and have been successfully treating Strep pharyngitis with very low incidence of poststreptococcal sequelae, using various natural antibiotics, and natural immune enhancing therapies, for close to one hundred years" [AANP Position Paper on Treatment of Strep Pharyngitis (1992)]

Comment: Naturopaths have never published a study documenting the incidence of post-streptococcal rheumatic fever in patients treated by their methods. If the treatment advocated by this Position Paper were to become more common, it would lead to a certain rise in the incidence of rheumatic heart disease. The "one hundred year" claim is impossible: it was not until about 1930 that rheumatic fever was understood to be a sequel of streptococcal infections.

"Goldenseal is one of the most effective of the herbal antimicrobial agents" [and] "may be ideal in the treatment of 'strep throat'" [Pizzorno JE and Murray MT (eds.) *Textbook of Natural Medicine (TNM)*, Churchill Livingstone, Edinburgh, 1999. p. 1187]

Comment: Goldenseal has no antimicrobial activity when given orally to a patient.

### Stroke

"Another hydrotherapy technique with a similar rationale is to soak the feet in a hot foot bath, as soon as possible after the stroke has occurred, while applying a cold compress to the neck, face and scalp. If this technique can be applied as a stroke is happening, it may even abort the stroke. Make sure the ice-cold compress touches the skin over the carotid arteries under the jaw bone. Mustard paste or powder may be added to the foot bath to increase the heating effect. Make sure to continue this treatment for at least 20 minutes." [Kane E. Stroke. AANP Web site]

Comment: It is now possible, in many cases, to abort strokes by emergent medical intervention. Following the fanciful advice above would guarantee that there is no chance for such timely intervention.

### "Toxins"

"It is conservatively estimated that up to 25% of the US population suffer to some extent from heavy metal poisoning. Hair mineral analysis is a good screening test for heavy metal toxicity." [*Textbook of*

Comment: The first statement is alarmist and false. The second is fraudulent.

### **Tuberculosis**

"Bernard Lust, considered the founder of naturopathic medicine, was cured of tuberculosis through hydrotherapy." [Mary & Michael Morton. "Naturopathic Medicine," from Healthworld Online]

Comment: Simply stating it doesn't make it so. Nevertheless, it serves as the only evidence for most naturopathic claims.

### **More Untested Claims**

"Every day, all over America, we are helping people heal diseases that are supposed to be incurable,' said Dr. James Sensenig." (Founding Dean of the Bridgeport Univ. College of Naturopathic Medicine, owned by the "Moonies"). [Quoted in Naturopathy: An age-old medicine for the "New Age." by Susan M. Fitzgerald, Communications Coordinator, National College of Naturopathic Medicine, Portland, Oregon]

"Dr. Stephen Speidel, an N.D. practicing in Poulsbo, Washington, says, 'A good example of how we in naturopathic medicine use the healing force in the body is what we do or don't do when a child has a fever. Often times a fever is a way that the body rids itself of a bacteria [sic] that only grows in certain temperatures. "Most parents say, 'My God, my child has a fever. We have to stop that fever. Give him aspirin or Tylenol.' I tell them, 'Imagine that your child has a helper, which is the immune system.' If you take the aspirin, it's like taking a sledge hammer to your child's immune system and saying, 'Be quiet and sit down!' And it will." [Mary & Michael Morton. "Naturopathic Medicine," from Healthworld Online]

Comment: In fact, fever is a potent immunosuppressant, and there is no evidence that it helps to rid the body of bacteria. Furthermore, high fevers in infants and toddlers are dangerous in other ways, including the triggering of febrile seizures.

### **Summary**

Anyone with medical knowledge can peruse various naturopathic treatises and find similar frauds, deceits, or misrepresentations of facts on almost every page.

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## Naturopathic State Laws



- 1. The red states require a license to practice Naturopathy.**  
Florida hasn't issued a license to a naturopath since the mid 1950's. At that time applicants were required to have a professional degree, for example, M.D. or D.O.
- 2. The blue states don't require a license to practice Naturopathy.**
- 3. Registration is required in The District of Columbia and Kansas in order to practice Naturopathy.**
- 4. The practice of Naturopathy is prohibited in South Carolina and Tennessee.**



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