

**Board of Health Professions  
Regulatory Research Committee  
Virtual Meeting**

**August 20, 2020**

**9:09 a.m.**

**9960 Mayland Dr, Henrico, VA 23233**

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Due to the COVID-19 declared state of emergency and consistent with Amendment 28 to HB29 (Budget Bill for 2018-2020) and the applicable provisions of § 2.2-3708.2 in the provisions of Freedom of Information Act, the Board convened a virtual meeting to consider such regulatory and business matters as presented on the agenda necessary for the board to discharge its lawful purposes, duties and responsibilities.

An audio file of this meeting may be found here:

<https://www.dhp.virginia.gov/audio/BHP/FullBoardMeeting08202020.mp3>

**Board Member  
Attendance**

Virtual-Louise Hershkowitz, CRNA, MSHA, Board of Nursing

Virtual-John Salay, MSW, LCSW, Board of Social Work

In-Person-James Wells, RPH, Citizen Member

Virtual-Martha S. Rackets, MS, Citizen Member

**Absent**

Louis R. Jones, Board of Funeral Directors & Embalmers

Maribel Ramos, Citizen Member

**DHP Staff**

Virtual-Barbara Allison-Bryan, Chief Deputy Director DHP

Virtual-David Brown, DC, Director DHP

In-Person-Elizabeth A. Carter, PhD, Executive Director BHP

In-Person-Laura Jackson, MSHSA, Operations Manager BHP

Virtual-Yetty Shobo, PhD, Deputy Executive Director BHP

Virtual-Corie Tillman-Wolf, Executive Director for the Boards of Funeral Directors & Embalmers, Long-Term Care Administrators and Physical Therapy

Virtual-Elaine Yeatts, Senior Policy Analyst DHP

**Virtual Observers-  
Participant List**

Ashley Wright

Baron Glassgow

Ben Traynham

C. Barrineau

Jo Twombly  
John Hanks  
K. Wilkinson  
Marie Rodriguez  
Mark (last name not provided)  
Richard Grossman  
Sarah Giardenelli  
Tim Faerber  
Tyler Cox

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### **Introductory Comments**

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**Chair** Mr. Wells **Time:** 9:06 a.m.

Mr. Wells specified that the focus of the meeting was to discuss the research and public comment received pertaining to the Study into the Need to Regulate Diagnostic Medical Sonographers and the Need to Regulate Naturopathic Doctors. He advised that the Committee's findings and recommendations pertaining to the respective professions under study would be reported to the full Board meeting at 11:00 a.m.

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### **Roll Call**

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**Chair** Mr. Wells

A roll call of the Committee members and staff was taken, with attending members acknowledging presence when his or her name was called.

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### **Quorum Established**

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Quorum was established with four members in attendance (3 virtual attendees, 1 in-person)

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### **Call to Order**

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**Chair** Mr. Wells **Time:** 9:09 a.m.

Mr. Wells, Chair of the Committee called the meeting to order at 9:09 a.m.

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## **Approval of Agenda**

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**Chair** Mr. Wells

Mr. Wells entertained a motion to approve the agenda as presented. On properly seconded motion by Ms. Hershkowitz, all members voted in favor, none opposed.

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## **General Public Comment**

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Ms. Jackson reported that the Board office had not received any requests to provide general oral public comment prior to the August 19, 2020 5:00 p.m. deadline.

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## **Previous Committee Meeting Minutes**

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On properly seconded motion by Mr. Salay to accept the meeting minutes from the June 25, 2020 meeting as presented, all members voted in favor of approval, none opposed.

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## **Diagnostic Medical Sonographer Study Findings**

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**Presenter** Ms. Jackson

Mr. Wells reminded the Committee that the draft of the Diagnostic Medical Sonographer report in the meeting packet is the final staff draft of the research conducted.

Ms. Jackson provided an overview of the report and acknowledged that no public comment had been received by the deadline.

## **Review of the Criteria**

The Committee then moved to discussion of its findings and recommendations. The Committee agreed that the profession, itself, did not pose a risk of harm to the public responsive to Criterion One.

### **Criterion One: Risk for Harm to the Consumer**

On properly seconded motion by Mr. Salay the Committee voted that there is insufficient evidence of harm attributable to the practice of diagnostic medical sonography by individuals credentialed to justify regulation by the state. However, the Committee has concerns about the emerging use of 3-D sonography for "Keepsakes" being offered by some photographers and recommends referral of the issue to the full Board for further discussion. All members voted in favor, none opposed.

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## **Naturopathic Doctor Study Findings**

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**Presenter** Dr. Carter

Mr. Wells reminded the Committee that the Naturopathic Doctor report provided in the meeting packet is the final staff draft of the research conducted.

Dr. Carter provided an overview of the report and summarized the public comment the Board office received by August 17, 2020, 5:00 p.m.

### **Public Comment Review**

Dr. Carter reported that written comment was received by the Board office from July 27, 2020 through August 17, 2020 (5:00 p.m.) and that oral comment was also received during a public hearing on August 11, 2020. All comments have been provided in advance of today's meeting.

There were over 170 written comments, with 14 opposed and 15 oral commenters, with nine in favor and six in opposition.

Pros of regulation: Over 90 comments in favor were from the patients of the group seeking regulation. Most cited the aid they or their family members had received from NDs, the costs associated with having to go to other providers for physical examinations and testing, and some noted confusion over the different types of naturopathic providers. The remaining comments were from ND students, their parents, ND organizations at state and national levels, and individuals from other provider professions. Several commenters noted that NDs could work safely in solo practices and in primary care and integrative care practices.

Cons of regulation: Individuals working as what the report refers to as traditional naturopaths indicated that they are not interested in, nor do they feel it is necessary, to regulate the practice of naturopathy, itself, because it is non-invasive. They referred to the Board's 2005 study conclusions to that effect. They also cited the concern that those seeking regulation as naturopathic doctors have been evolving their practices and are diverting from pure naturopathy to include the allopathic features. This group is very much opposed to state regulation as they feel it will affect their ability to make a living. According to them, they are not causing harm now.

Commenters from the Medical Society of Virginia and several allopathic specialty organizations expressed concerns over educational training differences between NDs and MDs and the variability among ND education and training, over time, that may not enable each ND to adequately address patient needs, especially children.

Mr. Wells entertained a motion to accept the draft of the Naturopathic Doctor report. On properly seconded motion by Ms. Hershkowitz, all members voted in favor, none opposed.

The Committee then moved on to discussion of its findings and recommendations.

### **Review of the Criteria**

The Committee discussed the research and public comment and determined their findings and recommendations responsive to the Criteria, as follows:

**Criterion One: Risk for Harm to the Consumer**

The group seeking regulation does present a potential for harm to the consumer that could be remedied through state regulation. The Committee deemed it important that consumers to be able to readily distinguish among practitioner types. The Committee is also concerned over the potential for harm from delays in care attributable to the inability of practitioners to conduct physical examinations and certain tests, themselves, often requiring the consumer to go elsewhere for these services.

**Criterion Two: Specialized Skills and Training**

The profession has demonstrated requirements for specialized skills and training.

**Criterion Three: Autonomous Practice**

The profession is practiced within its legislatively focused scope of practice autonomously in some states and in collaborative arrangements in others.

**Criterion Four: Scope of Practice**

The scope of practice is distinct although there is overlap with other professions. The scope should be determined by the Legislature taking into consideration the specific educational curriculum, training, and competency examination.

**Criterion Five: Economic Impact**

Regulation of this group is justified to help consumers avoid the cost of duplicated services. Other practitioners of naturopathy could have statutory exemptions that continue to permit them to practice.

**Criterion Six: Alternatives to Regulation**

The Committee held that all six criteria were met and that consumer redress through the Better Business Bureau and civil remedies do not adequately address the potential for patient harm. State regulation could do so.

**Criterion Seven: Least Restrictive Regulation**

The Committee concluded that registration and statutory certification (title protection) do not adequately address the potential for patient care harm.

Ms. Hershkowitz moved the following:

The Committee recommends licensure of naturopathic doctors, under the Board of Medicine, to authorize the scope of practice that includes physical exams, orders and interpretation of lab tests, orders for medical imaging to be interpreted by an other qualified provider to not include prescriptive authority of pharmaceuticals other than those specifically of the naturopathic variety or over the counter. And to include a recommendation to include the following statement from

SB858: Any lay person who is not licensed under this chapter from (i) providing natural health consulting on ayurvedic medicine, traditional naturopathic therapies, herbalism, nutritional advice, or homeopathy, or (ii) from selling vitamins and herbs, provided the person or lay practitioner does not use any title prohibited under § **54.1-2956.14**.

The motion was properly seconded by Mr. Salay.

Discussion: After discussion, the following amended motion was made by Ms. Hershkowitz.

Amended Motion: The Committee moves that licensure of Naturopathic Doctors seeking regulation be recommended. The scope of practice should include physical exams, orders relating to lab tests and interpretation of lab tests, orders for x-rays or other videography but with the interpretation by another qualified practitioner. Further there should be no prescriptive authority for legend drugs. The profession should be regulated under the Board of Medicine. Also, lay practitioners who are not licensed under this chapter are not precluded from (i) providing natural health consulting on Ayurvedic medicine, traditional naturopathic therapies, herbalism, nutritional advice, or homeopathy, or (ii) from selling vitamins and herbs, provided the person or lay practitioner does not use any title prohibited under § **54.1-2956.14**.

The motion carried with all members in favor of the amended motion, none opposed.

### **New Business**

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**Presenter** Mr. Wells

#### **Discussion**

There was no new business.

### **Next Committee Meeting**

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**Presenter** Mr. Wells

#### **Discussion**

The next committee meeting will be held November 10, 2020.

**Adjourned**

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**Adjourned**      10:40 a.m.

**Chair**                      James Wells, RPh

Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

**Board Executive  
Director**                  Elizabeth A. Carter, PhD

Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

## Naturopathic Doctor Public Comment Summary

Written public comment was received from July 27 through August 17, 2020 (5:00 p.m.). Oral comment was also received during a public hearing on August 11, 2020. All comments have been provided to the Regulatory Research Committee in advance of the August 20, 2020 meeting.

There were over 170 written comments, with 161 (three duplicates) in favor of licensure and 14 in opposition. There were 15 oral commenters, with nine in favor and six in opposition.

Among those favoring regulation, the vast majority (99 written and one oral) indicated that they were patients. Most cited ND aid in their or their family members' medical conditions, the cost associated with going to other providers to obtain physical examinations and testing, and some noted confusion over the different types of naturopathic providers. Among the last group, several had come from other states that regulate the profession. The remaining comments in favor were from NDs, ND students and their parents, ND organizations at state and national levels, and individuals from other provider professions, such as physicians, chiropractors, nurses, pharmacists, and behavioral science practitioners who had experience with the profession. Several noted that NDs could work in solo practices or primary care and integrative care practices.

Among those opposed to regulation, 14 provided written comment and six oral. The chief concerns reported were that naturopathy, itself, as originally defined and practiced by more than 400 practitioners throughout the state does not pose harm. As such, they contend that these practitioners should not be required to become regulated by the state. They also note concerns over the potential impact to jobs and access by consumers seeking traditional naturopathy and other forms of natural healing support. Other concerns related to patient safety were that the ND group nationally has departed from original naturopathy by incorporating certain allopathic medicine practices such as vaccinations, minor surgeries, and prescribing label drugs, for example. Additionally, the Medical Society of Virginia and several constituent specialty associations, including a representative from the Virginia Chapter of the American Academy of Pediatrics expressed concerns over educational and training differences between NDs and MDs and variability among ND education and training over time that may not enable each ND to adequately address patient needs, especially children.



TOLL-FREE 800.262.8777  
LOCAL 540.667.0600  
FAX 540.667.6562

BOARD OF HEALTH PROFESSION  
REGULATORY RESEARCH COMMITTEE  
VIRTUAL MEETING AND PUBLIC HEARING

TUESDAY, AUGUST 11, 2020  
11:19 A.M.

VIRGINIA DEPARTMENT OF HEALTH PROFESSIONS  
9960 MAYLAND DRIVE  
HENRICO VIRGINIA 23233



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1                   **APPEARANCES**

2 **COMMITTEE MEMBERS AND STAFF:**

3 CHAIRMAN JAMES WELLS, RPH, CITIZEN MEMBER

4 ELIZABETH A. CARTER, PhD, EXECUTIVE DIRECTOR BHP

5 LOUISE HERSHKOWITZ, CRNA, MSHA, BOARD OF NURSING

6 JOHN SALAY, MSW, LCSW, BOARD OF SOCIAL WORK

7 DR. MARTHA RACKETS, CITIZEN MEMBER

8 YETTY SHOBO, PhD, DEPUTY EXECUTIVE DIRECTOR BHP

9 BARBARA ALLISON-BRYAN, CHIEF DEPUTY DIRECTOR DHP

10 LAURA JACKSON, MSHA, OPERATIONS MANAGER BHP

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12 **SPEAKERS:**

13 DR. CLIFFORD MORRIS

14 DR. SARAH GIARDENELLI

15 DR. ROBERT KACHKO

16 DR. LEAH HOLLON

17 DR. DAN SEITZ

18 DR. MARIE RODRIGUEZ

19 DR. CARRIE RUNDE

20 CLARK BARRINEAU

21 JOHN HANKS

22 DR. DECKER WEISS

23 DR. BARBARA BOARDMAN

24 CASSADY MORRIS

25 JULIE COOMBS

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1                   **APPEARANCES**

2 **SPEAKERS:**

3 APRIL GARNETT

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5 **ALSO IN APPEARANCE:**

6 MATT TREACY (MEDIA PRODUCTION SPECIALIST FOR THE

7 AGENCY)

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1                   **BOARD OF HEALTH PROFESSIONS**

2                   **REGULATORY RESEARCH COMMITTEE**

3                   **VIRTUAL MEETING AND PUBLIC HEARING**

4                   **VIRGINIA DEPARTMENT OF HEALTH PROFESSIONS**

5                   **TUESDAY, AUGUST 11, 2020**

6                   **11:19 A.M.**

7                   **CHAIRMAN WELLS:** Good morning,

8 hi, my name is Jim Wells and I'm the Chair of the

9 Board of Health Professions Regulatory Research

10 Committee. The public hearing to receive oral

11 comment on two Sunrise reviews will be held now.

12 First is the need to regulate diagnostic medical

13 sonographers, and two, the need to regulate

14 naturopathic doctors, and I call this to order.

15 **(WHEREUPON, the Chairman called the meeting to**

16 **order.)**

17                   **CHAIRMAN WELLS:** Note please the

18 written comment for both studies will end at 5:00

19 p.m. on August 17th, 2020. Oral public comment

20 closed August 10, 2020 at 5:00 p.m. Written

21 comment relating to the diagnostic medical

22 sonographer review should be sent to

23 Laura.Jackson@DHP.virginia.gov. Written comment

24 relating to naturopathic doctor reviews should be

25 sent to Elizabeth.Carter@DHP.virginia.gov. All

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1 comments will be incorporated into retrospective

2 study reports for consideration by the Committee,

3 the Committee will determine its findings and

4 recommendations at the August 20th, 2020 9:00

5 a.m. meeting and report to the full Board later

6 on that day. As indicated on the second page of

7 the agenda, to report an interruption while we

8 are broadcasting, please dial 804-367-2115, again

9 that's 804-367-2115. Any interruption in the

10 broadcast of this meeting will result in the

11 suspension of action until any repairs can be

12 made and public access is restored. Please note

13 that this public hearing is being recorded.

14 Please insure that your line remains muted at all

15 times when not speaking. A roll call of the

16 Committee Members and staff will now be taken.

17 Committee Members and staff, when your name is

18 called, unmute your line so you may verbally

19 indicate your presence, and because we have folks

20 from the public in this meeting if you would

21 state which Board or which position you represent

22 with the Board of Health Professionals. And I

23 will now call the Committee's names: Louise

24 Hershkowitz, Board of Nursing?

25                   **MS. HERSHKOWITZ:** (No audible



6	<p>1 response.)</p> <p>2 <b>EXECUTIVE DIRECTOR CARTER:</b> I see</p> <p>3 her, hold on.</p> <p>4 <b>CHAIRMAN WELLS:</b> Okay, now you're</p> <p>5 unmuted.</p> <p>6 <b>MS. HERSHKOWITZ:</b> This is Louise</p> <p>7 Hershkowitz from the Board of Nursing and I am</p> <p>8 present.</p> <p>9 <b>CHAIRMAN WELLS:</b> Okay. John</p> <p>10 Salay, Board of Social Work.</p> <p>11 <b>MR. SALAY:</b> John Salay is here</p> <p>12 with the Board of Social Work present.</p> <p>13 <b>CHAIRMAN WELLS:</b> Dr. Martha</p> <p>14 Rackets, citizen member.</p> <p>15 <b>DR. RACKETS:</b> This is Martha</p> <p>16 Rackets, and I am present.</p> <p>17 <b>CHAIRMAN WELLS:</b> Mr. Louis Jones,</p> <p>18 Board of Funeral Directors &amp; Embalmers.</p> <p>19 <b>MR. JONES:</b> (No audible response.)</p> <p>20 <b>CHAIRMAN WELLS:</b> He is having some</p> <p>21 technical difficulties and I don't know if he's</p> <p>22 with us or not, but send us a sign if you. And</p> <p>23 Maribel Ramos, citizen member?</p> <p>24 <b>MS. RAMOS:</b> (No audible response.)</p> <p>25 <b>CHAIRMAN WELLS:</b> Okay, moving to</p>	8
7	<p>1 Board staff, Agency staff, and the Assistant</p> <p>2 Attorney General. Dr. Yetti Shobo, Deputy</p> <p>3 Executive Director for the Board.</p> <p>4 <b>DEPUTY EXECUTIVE DIRECTOR SHOBO:</b></p> <p>5 Present, here.</p> <p>6 <b>CHAIRMAN WELLS:</b> Okay, Dr.</p> <p>7 Allison-Bryan, Chief Deputy Director for the</p> <p>8 Agency?</p> <p>9 <b>DR. ALLISON-BRYAN:</b> Dr. Allison-</p> <p>10 Bryan is present.</p> <p>11 <b>CHAIRMAN WELLS:</b> And Carrie</p> <p>12 Mitchell, Assistant Attorney General.</p> <p>13 <b>MS. MITCHELL:</b> (No audible</p> <p>14 response).</p> <p>15 <b>CHAIRMAN WELLS:</b> Okay, and in the</p> <p>16 room here with me, Dr. Elizabeth Carter,</p> <p>17 Executive Director for the Board.</p> <p>18 <b>EXECUTIVE DIRECTOR CARTER:</b> I'm</p> <p>19 here.</p> <p>20 <b>CHAIRMAN WELLS:</b> Laura Jackson,</p> <p>21 Operations Manager for the Board.</p> <p>22 <b>MS. JACKSON:</b> Present.</p> <p>23 <b>CHAIRMAN WELLS:</b> Cheryl Lane,</p> <p>24 Court Reporter.</p> <p>25 <b>COURT REPORTER:</b> I'm present.</p>	9

<p style="text-align: right;">10</p> <p>1 credentials. It also helps medical professionals  2 like me in knowing basically who I'm dealing  3 with. It's vital that we all hold each other  4 accountable and I think having naturopathic  5 doctors licensed would be the best way to do  6 that, and naturopathic doctors really want to be,  7 they want to be held accountable, and I think  8 that's going to be the best for healthcare in  9 Virginians and everybody in general. In  10 addition, licensing naturopathic doctors would  11 lessen the social and economic burden within the  12 communities. Lack of primary care adds emotional  13 and financial burden on providers and the system  14 as a whole, and due to the lack of primary care  15 providers, patients often show up in emergency  16 rooms in critical condition, you know, in surgery  17 and emergency departments, and this is a  18 financial weight that we all suffer. So much of  19 this is done prior to them coming to the  20 emergency room and you know, be coming in in  21 emergent condition. The extents of secondary or  22 tertiary prevention, including repair and  23 surgeries are more expensive than true  24 prevention, and that's what naturopathic doctors  25 are, they are preventative, they are preventative</p>	<p style="text-align: right;">12</p> <p>1 this is again what makes them different, and in  2 this COVID-panicked society, this becomes very,  3 very important. I have been working with  4 naturopathic colleagues for over ten years, and  5 my relationship with naturopathic doctors, I'm  6 uniquely grateful that I have the ability to  7 provide collaborative care to my patients. They  8 know when to refer. They work collaboratively  9 and individually, but at the time naturopathic  10 doctors in Virginia, as you know, aren't able to  11 work to the full scope of their training, they  12 are unable to order labs, and not able to get  13 imaging, conduct physical exams, even though they  14 have been trained to do so. You can see in  15 Maryland naturopathic doctors providing these  16 services because those jurisdictions license  17 naturopathic doctors and allow them to function  18 autonomously. When I see that naturopathic  19 doctors are working to the best of their ability  20 without the basic tools of physical exam and  21 labs, not having these basic tools can lead to  22 harm for patients and I think this really needs  23 to change. So in summary, I am in full support  24 of licensing naturopathic doctors and I am  25 encouraging the Board to recommend in favor of</p>
<p style="text-align: right;">11</p> <p>1 doctors. That's their specialty. So licensing  2 naturopathic doctors is a preventative measure,  3 it's cost effective, and that same solution for  4 all healthcare sectors. The knowledge and  5 ability of naturopathic doctors enables them to  6 transfer various therapies, individualizing them  7 as needed for each person, they bring a very  8 unique skillset to the existing licensing  9 providers currently in Virginia. Naturopathic  10 doctors also have a limb of compassionate care  11 that any traditional doctor typically cannot  12 provide consistently. This makes them unique in  13 their approach, they treat and see the entire  14 person holistically and in many cases the  15 naturopathic doctor can provide additional  16 services that I personally don't have time to  17 address or nor that I received in my training.  18 More specifically I wish that I had received  19 instruction within therapeutic nutritional  20 counseling during my conventional medical  21 training, but it was not in my curriculum.  22 Knowing that I can refer to them to help my  23 patients, reassure them, because they can spend  24 the time dealing with the psychosocial aspect as  25 they approach the medical disease themselves, and</p>	<p style="text-align: right;">13</p> <p>1 licensure as well. Let's allow my naturopathic  2 colleagues the ability to work to the fullest of  3 their capability in their training and scope,  4 while delivering humanistic, preventive and  5 individual, personal care to every patient. In  6 over ten years I have experiencing, of experience  7 working with naturopathic doctors, I respect them  8 as just that, doctors. Thank you for your  9 consideration.  10 <b>CHAIRMAN WELLS:</b> Thank you, Dr.  11 Morris. If I could ask you to mute so we don't  12 over...  13 <b>EXECUTIVE DIRECTOR CARTER:</b> Thank  14 you. Could I ask a question?  15 <b>CHAIRMAN WELLS:</b> Sure, sure. One  16 thing, let me do one little housekeeping thing  17 here that I should have. In order to gain full  18 information, the speakers, we will allow  19 Committee Members and staff members to ask  20 questions because this is our one opportunity for  21 a little bit of give and take and some  22 information, so Dr. Carter, you have a question?  23 <b>EXECUTIVE DIRECTOR CARTER:</b> Are  24 there any Members first, anyone have a question  25 about, okay.</p>

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1           **CHAIRMAN WELLS:** Sure. Are any of  
 2 the Committee Members, do they have a question  
 3 for Dr. Morris?  
 4           **COMMITTEE MEMBERS:** (No audible  
 5 response.)  
 6           **CHAIRMAN WELLS:** Okay, go ahead.  
 7           **EXECUTIVE DIRECTOR CARTER:** You've  
 8 been working them for the past ten years? I'm  
 9 sorry. So the services that they have been  
 10 providing, have they been able to bill for that  
 11 through you or is it something that they just do  
 12 as individuals?  
 13           **DR. MORRIS:** No, they just, they  
 14 do not bill to me, they, they have their own  
 15 individual service that they bill though in their  
 16 offices.  
 17           **EXECUTIVE DIRECTOR CARTER:** Right.  
 18 And do you have, like for example, for nurse  
 19 practitioners there would be a, would have been  
 20 changed recently. A collaborative practice  
 21 written agreement or is it more a little less  
 22 formal than that?  
 23           **DR. MORRIS:** It's less formal. I  
 24 have, I have no written agreement with them, it  
 25 is strictly a trust issue, and you know, I'm a

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1 preventive cardiologist, so I'm going to send my  
 2 folks to somebody who is interested in getting my  
 3 folks well. You know, in medical school we  
 4 learned a lot about how to put people on drugs  
 5 and medications, but very little about how to get  
 6 people off drugs and medications, and preventing,  
 7 in my opinion, is the answer, but I think the  
 8 naturopathic doctors, in my experience, have been  
 9 very, very useful and effective at that. I like  
 10 the fact that they, they know when to stop, they  
 11 know, at least the ones I have dealt with, they  
 12 know when to back off, and they know when to ask  
 13 questions, and I think just giving them the  
 14 opportunity to work collaboratively I think is  
 15 going to be a great thing, I'm sure, particularly  
 16 again, I'm seeing more patients today with racing  
 17 hearts and anxiety because of this COVID  
 18 situation around us, and you know, the politics,  
 19 and you know, I've, I've heard, I tell my  
 20 patients cut the TV off.  
 21           **EXECUTIVE DIRECTOR CARTER:** Thank  
 22 you very much, I appreciate it.  
 23           **CHAIRMAN WELLS:** Thank you, Dr.  
 24 Morris.  
 25           **DR. MORRIS:** Okay.

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1           **CHAIRMAN WELLS:** Any further  
 2 questions from any Committee Members or anyone?  
 3           **ATTENDEES:** (No audible response.)  
 4           **CHAIRMAN WELLS:** Thank you, Dr.  
 5 Morris.  
 6           **DR. MORRIS:** Okay.  
 7           **CHAIRMAN WELLS:** We will now move  
 8 on to Dr. Sarah Garden...  
 9           **EXECUTIVE DIRECTOR CARTER:**  
 10 Giardenelli.  
 11           **CHAIRMAN WELLS:** ... Giardenelli,  
 12 President of the Virginia Association of  
 13 Naturopathic Physicians.  
 14           **DR. GIARDENELLI:** Hello, my name  
 15 is Sarah Giardenelli, I'm a naturopathic doctor  
 16 and President of the Virginia Association of  
 17 Naturopathic Physicians. On behalf of all our  
 18 members, I would like to thank the Committee for  
 19 your diligence in researching naturopathic  
 20 medicine and to see between medically trained  
 21 naturopathic doctors and lay naturopaths.  
 22           It is clear that a great amount of  
 23 labor went into this, and your efforts are much  
 24 appreciated. In 2005 the VAANP is the  
 25 professional society representing medically

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1 trained naturopathic doctors, or ND's in  
 2 Virginia.  
 3           We have been pursuing licensing  
 4 since 2005, the same year that naturopaths and  
 5 naturopathic medicine were first evaluated by the  
 6 Board of Health Professions. We were the first  
 7 profession to be evaluated under the standing  
 8 criteria. We track data on medically trained  
 9 ND's and to our knowledge, there are currently  
 10 around forty practice locations of licensable  
 11 ND's, comparatively there were only sixty genetic  
 12 counselors total living or working in Virginia at  
 13 the time licensure was recommended for that  
 14 profession in 2014. And there are only currently  
 15 forty-six operating in Virginia.  
 16           Both traditional naturopaths and  
 17 medically trained ND's have shared roots, the  
 18 split between the two groups occurred after the  
 19 release of the PLSMA Report in 1910. This report  
 20 spurred a nationwide shift for all healthcare  
 21 providers to educational, scientific, and  
 22 professional standards. Safety, accountability,  
 23 professional standards, this is why we are here.  
 24 While naturopathic medicine is generally safe  
 25 there is a risk of harm, just as there is with

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1 any other health profession.  
 2 The written comment being  
 3 submitted by the VAANP provides examples of harm  
 4 from both medically trained ND's and lay  
 5 naturopaths, some tragic and heartbreaking that  
 6 highlight the importance of regulation. One  
 7 particular example in Virginia Beach still weighs  
 8 on me, and this ND is still seeing clients due to  
 9 lack of regulation in Virginia.  
 10 Finally, in regards to economic  
 11 impact, our members are often referred the most  
 12 difficult cases from our medical colleagues. It  
 13 is common for patients to tell our members, I've  
 14 seen everyone else, you are my last resort. Many  
 15 of us have become expert in supporting such folk  
 16 in redeeming their health, with one hand tied  
 17 behind our backs given the lack of licensure.  
 18 Imagine what more we could offer our patients  
 19 most in need to the healthcare system with a  
 20 practice license that would increase patient  
 21 access to a scope of services more in line with  
 22 our rigorous training and enable us to serve in  
 23 all our areas.  
 24 Imagine. Imagine your son or  
 25 daughter having invested in their passion and not

19

1 being able to return to their home state or  
 2 coming home and then starting to pay off their  
 3 large medical school loans, because the reality  
 4 is that it is difficult for our members to serve  
 5 and to thrive without licensing, and it defines  
 6 scope of practice and the way ought to be able  
 7 to.  
 8 Licensing naturopathic doctors is  
 9 a benefit for our Commonwealth, for the  
 10 overburdened healthcare system, for the ND's who  
 11 lives and work in Virginia, and most importantly,  
 12 for safe and informed access to naturopathic  
 13 medicine and care for patients. Thank you again  
 14 to the Committee for your diligence, time, and  
 15 effort and consideration of full licensure for  
 16 medically trained naturopathic doctors.  
 17 **CHAIRMAN WELLS:** Thank you, Dr.  
 18 Giardenelli. Okay. Do any Committee Members  
 19 have a question for Dr. Giardenelli?  
 20 **MR. SALAY:** Yes, I do.  
 21 **CHAIRMAN WELLS:** Okay, Mr. Salay.  
 22 **MR. SALAY:** Doctor, so what are  
 23 your current revenue sources? Is it a fee for  
 24 service, is it, does the client pay out of pocket  
 25 and...

20

1 **DR. GIARDENELLI:** We have a  
 2 state...  
 3 **MR. SALAY:** How do you see that  
 4 changing?  
 5 **DR. GIARDENELLI:** Yes, already.  
 6 With the lack of licensure, there's no insurance  
 7 company that will credential us at this point and  
 8 we also because of lack of licensure cannot use  
 9 even a level of service or basic insurance  
 10 coding, because that would be practicing medicine  
 11 without a license. So right now our patients  
 12 just pay us for the time, so it's the personal  
 13 risk and we can't even get them pills, and  
 14 licensing would change that because we would be  
 15 able to provide medical level care that would be  
 16 able to justify the use of the same codes that  
 17 other healthcare providers us that would allow  
 18 for some level of reimbursement perhaps. Thank  
 19 you.  
 20 **CHAIRMAN WELLS:** All right.  
 21 Anyone else?  
 22 **ATTENDEES:** (No audible response.)  
 23 **CHAIRMAN WELLS:** Dr. Carter?  
 24 **EXECUTIVE DIRECTOR CARTER:**  
 25 Speaking to, I know you mentioned pills, are you

21

1 all seeking prescriptive authority? What's the  
 2 scope that you all are envisioning for your  
 3 profession?  
 4 **DR. GIARDENELLI:** That's a great  
 5 question, and I know colleagues speaking out for  
 6 me that include that in their testimony, and so  
 7 if it's okay with you for me to defer to them, I  
 8 will do that. Is that okay?  
 9 **EXECUTIVE DIRECTOR CARTER:** That's  
 10 fine, thank you. And there's just one other  
 11 point. You aren't the first to have the criteria  
 12 while we have been doing this since 1986, but  
 13 anyway, just wanted you to know over a hundred  
 14 professions have been reviewed using the  
 15 criteria, so. We didn't pick on you.  
 16 **DR. GIARDENELLI:** Thank you for  
 17 that.  
 18 **EXECUTIVE DIRECTOR CARTER:** Thank  
 19 you.  
 20 **CHAIRMAN WELLS:** All right, thank  
 21 you Doctor. Next, Dr. Robert...  
 22 **MS. HERSHKOWITZ:** Mr. Chair? Mr.  
 23 Chair?  
 24 **CHAIRMAN WELLS:** Yes, yes.  
 25 **MS. HERSHKOWITZ:** This is Louise



22	<p>1 Hershkowitz.</p> <p>2 <b>CHAIRMAN WELLS:</b> I'm sorry.</p> <p>3 <b>MS. HERSHKOWITZ:</b> I did have a</p> <p>4 couple of questions.</p> <p>5 <b>CHAIRMAN WELLS:</b> Sure.</p> <p>6 <b>MS. HERSHKOWITZ:</b> It was noted in</p> <p>7 the report that naturopathic doctors, I'm sorry,</p> <p>8 are trained at primary care providers and primary</p> <p>9 care physicians. To what degree do you</p> <p>10 understand that naturopathic doctors can provide</p> <p>11 the full scope of primary care as opposed to</p> <p>12 being interactive with other primary care</p> <p>13 providers?</p> <p>14 <b>DR. GIARDENELLI:</b> So right now</p> <p>15 it's my understanding that I believe have for</p> <p>16 clients, right, there are six states where</p> <p>17 naturopathic doctors are recognized as primary</p> <p>18 care providers, and in those states approximately</p> <p>19 now there are more of those providers seen to be</p> <p>20 at least in Oregon, I can speak to Oregon, over</p> <p>21 how this needs to be fulfilling our role, working</p> <p>22 as a client's primary care providers, and the</p> <p>23 other half are working more in a specialty role.</p> <p>24 And Vermont has a similar model where some of the</p> <p>25 naturopathic doctors participate in a single</p>	24	<p>1 you, Dr. Giardenelli.</p> <p>2 <b>DR. GIARDENELLI:</b> Thank you.</p> <p>3 <b>CHAIRMAN WELLS:</b> Okay. Next, Dr.</p> <p>4 Robert Kachko. Kachko?</p> <p>5 <b>DR. KACHKO:</b> That's correct,</p> <p>6 either/or. Thank you so much for the time. So</p> <p>7 Dr. Robert Kachko, President of the American</p> <p>8 Association of Naturopathic Physicians. I just</p> <p>9 want to start by thanking the Chair, Dr. Carter,</p> <p>10 and the Committee for the time this morning. I</p> <p>11 want to briefly cover three key areas, and then</p> <p>12 answer any questions that you may have. I want</p> <p>13 to talk about who we are at the AANP as a</p> <p>14 national profession of naturopathic physicians.</p> <p>15 I want to talk about why we are working for all</p> <p>16 this nationally and what we are working for</p> <p>17 nationally, and then I want to end on why it's so</p> <p>18 important. So in terms of who we are, the AANP</p> <p>19 represents several thousand licensed or</p> <p>20 licensable ND's within four year primary care</p> <p>21 level naturopathic medical programs, and we can</p> <p>22 diagnose and treat for truly comprehensive bio</p> <p>23 sectors. And these are currently licensed or</p> <p>24 regulated in twenty-five U.S. jurisdictions and</p> <p>25 we are pending in many more, with pending</p>
23	<p>1 program, and then some of the naturopathic</p> <p>2 doctors there to focus on specialty care where</p> <p>3 they are working on collaborating,</p> <p>4 collaboratively, so it's both, to answer your</p> <p>5 question, it's both. But we can help fill the</p> <p>6 gap and we also help work collaboratively.</p> <p>7 <b>MS. HERSHKOWITZ:</b> My other</p> <p>8 question had to do with, and this may be</p> <p>9 something your colleagues will take up, but in</p> <p>10 examining the broad scope of the states provide</p> <p>11 access through ND's, is there a model there that</p> <p>12 you think would be appropriate in Virginia?</p> <p>13 <b>DR. GIARDENELLI:</b> Yes, and my</p> <p>14 colleague, Marie, Dr. Marie Rodriguez will be</p> <p>15 speaking to those points and the model that we</p> <p>16 are hoping to provide, and also my colleague and</p> <p>17 you all might be able to answer some of those</p> <p>18 questions more specifically. I could answer it</p> <p>19 but I am going to be addressing that in their</p> <p>20 testimony if you don't mind holding for it.</p> <p>21 We're also happy to provide it. Thank you.</p> <p>22 <b>CHAIRMAN WELLS:</b> All right. Any</p> <p>23 other questions?</p> <p>24 <b>ATTENDEES:</b> (No audible response.)</p> <p>25 <b>CHAIRMAN WELLS:</b> All right, thank</p>	25	<p>1 legislation of many more. Nearby as I have</p> <p>2 mentioned earlier, we are licensed in Maryland</p> <p>3 and Washington, D.C., which will become pertinent</p> <p>4 in a moment.</p> <p>5 Nationally we have three goals as</p> <p>6 it pertains to regulation. We are working to</p> <p>7 extend educated access to comprehensive medical</p> <p>8 care we all know about the shortages of primary</p> <p>9 care, and how this contributed to difficulties.</p> <p>10 We are working to insure that medically trained</p> <p>11 ND's can practice to the full extent of their</p> <p>12 training and scope, and also to insure that using</p> <p>13 the title Naturopathic Doctor means that the</p> <p>14 provider graduated from an accredited</p> <p>15 naturopathic medicine program. Important there,</p> <p>16 our goal is not to restrict actual healthcare</p> <p>17 practitioners from working or to make natural</p> <p>18 therapy an exclusive province of ND's. In</p> <p>19 similar testimonies earlier about counseling and</p> <p>20 mental health.</p> <p>21 Turning to why this is so</p> <p>22 important. Quite simply, without it there is too</p> <p>23 much patient confusion. This becomes an issue of</p> <p>24 consumer protection. There currently exists in</p> <p>25 the State of Virginia and other unregulated</p>

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1 states, a legitimate risk of harm without  
 2 regulation and general protection. I can give an  
 3 example of my practice. I practice as a  
 4 naturopathic physician with full scope in the  
 5 State of Connecticut, I practice as a separate,  
 6 licensed acupuncturist in the State of New York.  
 7 My patients will leave the State of New York when  
 8 they need comprehensive medical care, because we  
 9 are not licensed or regulated there. Most people  
 10 in the unregulated states and unregulated  
 11 jurisdictions simply don't know to do this, and  
 12 that brings up opportunity where they might miss  
 13 a red flag that the patient comes in with. I  
 14 will give an example of a patient coming in, and  
 15 this has happened in my practice multiple times  
 16 concerning chest pain. As a primary care team  
 17 provider, I'm able both to help them get  
 18 diagnosed, I'm able to run an EKG and interpret  
 19 an EKG, and I'm able to refer for appropriate  
 20 acute care.  
 21 If that red flag of chest pain is  
 22 mismanaged by someone who has not had the  
 23 appropriate training, for example, mismanaged as  
 24 a musculoskeletal injury, I don't have to tell  
 25 you about the imminent threat that that provides.

27

1 As a provider in Connecticut that's particularly  
 2 concerning, but we have the same, the same  
 3 challenge in Maryland and D.C. As everyone  
 4 knows, people can live in Virginia and work in  
 5 D.C., they might know what a naturopath is, what  
 6 a naturopathic doctor is, and it's expected that  
 7 they have that four year medical training under  
 8 their belt. Unfortunately that's not always the  
 9 case, and our primary concern is to mitigate that  
 10 problem, but also to prevent chronic disease and  
 11 to do a truly comprehensive bio synthesis. Thank  
 12 you to the Committee for your attention, and I'm  
 13 happy to answer any questions.  
 14 **CHAIRMAN WELLS:** Okay. Any  
 15 questions folks?  
 16 **ATTENDEES:** (No audible response.)  
 17 **CHAIRMAN WELLS:** Dr. Clark?  
 18 **EXECUTIVE DIRECTOR CARTER:** No.  
 19 **CHAIRMAN WELLS:** Okay.  
 20 **EXECUTIVE DIRECTOR CARTER:** Thank  
 21 you.  
 22 **CHAIRMAN WELLS:** Thank you,  
 23 Doctor.  
 24 **DR. KACHKO:** Thank you.  
 25 **CHAIRMAN WELLS:** Okay. Next, Dr.

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1 Leah Hollen, Hollen?  
 2 **DR. HOLLEN:** (No audible  
 3 response.)  
 4 **EXECUTIVE DIRECTOR CARTER:** She's  
 5 muted.  
 6 **DR. HOLLEN:** Can you hear me?  
 7 **EXECUTIVE DIRECTOR CARTER:** Here  
 8 she comes.  
 9 **CHAIRMAN WELLS:** There you go.  
 10 Yes ma'am.  
 11 **DR. HOLLEN:** Hello, everyone. My  
 12 name is Leah Hollen, and I am a naturopathic  
 13 doctor. I live and work in Richmond, Virginia,  
 14 but before I started my actual comment. I am  
 15 happy to answer any questions about what ND's are  
 16 envisioning for this global practice at the  
 17 appropriate time, and so I just wanted to offer  
 18 that I served as a legislative chair and I can  
 19 speak to that happening with many other people to  
 20 crack the right kind of scope in Virginia, so.  
 21 If it's okay I will go ahead though and provide  
 22 my actual verbal testimony now, if that's okay.  
 23 **CHAIRMAN WELLS:** Go right ahead.  
 24 **DR. HOLLEN:** So my passion has  
 25 always been around prevention. Yes, can you hear

29

1 me?  
 2 **CHAIRMAN WELLS:** Yes.  
 3 **DR. HOLLEN:** Okay, sorry. My  
 4 passion has always been around prevention, this  
 5 is what led me to obtain my Master's in public  
 6 health and to naturopathic medicine. This is  
 7 because naturopathic doctors specialize in  
 8 prevention. We educate and empower patients as  
 9 well as communities to shift from disease into  
 10 health. We work holistically to encompass the  
 11 mind, body, and spirit, to also not just address  
 12 the physical ailments, but also complex issues  
 13 that we face as a society, including issues of  
 14 addiction, pain, and even imprints of  
 15 transgenerational trauma. We incorporate aspects  
 16 of the whole person and whole systems. In  
 17 addition to prevention, many of us see patients  
 18 that have failed multiple lines of therapy and  
 19 don't fit into a box, therefore we specialize in  
 20 restoration, and for some of the most vulnerable  
 21 patients. A large amount of my work includes  
 22 putting people back together after surgery,  
 23 radiation, chemotherapy, and we see some of the  
 24 most challenging cases because we are trained to  
 25 look at the deepest roots of illness to find the



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1 mechanisms back to wholeness. And due to this, we  
 2 see those who are lost in the system, despite  
 3 their best efforts and those of their doctors.  
 4 For some patients there is nothing  
 5 else to be offered. I cannot begin to tell you  
 6 the number of people that share with me that I am  
 7 their last hope. These words bring a level of  
 8 discomfort, and the reason is because working in  
 9 an unlicensed state is a heavy responsibility.  
 10 We have few resources to monitor the most  
 11 vulnerable patients because we cannot perform  
 12 physical exams, or run basic labs or imaging.  
 13 Yet they have been entrusted to us. Without the  
 14 scope of practice, monitoring becomes challenging  
 15 trying to consistently coordinate with other  
 16 physicians to run labs is insufficient, it comes  
 17 with a burden, and that burden is often to miss  
 18 multiple patients. It is not ethical and it is  
 19 not in line with our Hippocratic oaths. Everyone  
 20 suffers. This is harm. But let's factor in  
 21 something that is no in the criteria, a pandemic.  
 22 This pandemic is amplifying the gaps in our  
 23 system, our primary care has been overburdened  
 24 for years, as many of our specialists. With  
 25 COVID, many have left medicine altogether, and

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1 now the gap is widening for patients.  
 2 Six weeks ago I had a patient on  
 3 the brink of psychosis, I called two offices, I  
 4 couldn't get her in for a psychiatric consult for  
 5 seven weeks. One person offered me four months.  
 6 My choice was to figure it out on my own or send  
 7 her inpatient. She's a mother of four, and the  
 8 ethical dilemma of not being able to have a  
 9 license was amplified. I have no prescribing  
 10 rights and no hospital privileges. Another  
 11 patient progressed to pyelonephritis after being  
 12 turned away by her PCP. She sat in an ED waiting  
 13 room for four hours during the pandemic. But if  
 14 I suspect the patient has COVID, I'm unable to  
 15 even run basic testing. I must refer them with  
 16 the hopes of the testing that they're going to is  
 17 efficacious. And these cases present moral and  
 18 ethical dilemmas in patient care around  
 19 monitoring and prevention. This is also harm.  
 20 Maybe with this pandemic it is  
 21 time where we can now make a different choice,  
 22 one that chooses to lessen the pain, to prevent  
 23 further harm, and to engage in restoration.  
 24 Maybe at this time we, as naturopathic doctors,  
 25 can be more fully seen, recognized, and most

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1 importantly that our gifts will be accepted. I  
 2 thank you for your time and I ask that the Board  
 3 vote in favor of regular licensure.  
 4 **CHAIRMAN WELLS:** Thank you. Any  
 5 questions from the Board?  
 6 **BOARD MEMBERS:** (No audible  
 7 response.)  
 8 **CHAIRMAN WELLS:** From the  
 9 Committee Members?  
 10 **MS. HERSHKOWITZ:** Mr. Chair?  
 11 **CHAIRMAN WELLS:** Yes ma'am.  
 12 **MS. HERSHKOWITZ:** Mr. Chairman?  
 13 **CHAIRMAN WELLS:** Yes ma'am.  
 14 **MS. HERSHKOWITZ:** This is Louise  
 15 Hershkowitz. Dr. Hollen, how as a trained  
 16 naturopathic doctor do you determine when to  
 17 refer?  
 18 **DR. HOLLEN:** Great question. So  
 19 honestly, you know, based upon that person, we  
 20 require that all of our patients have a primary  
 21 care on board, and if they have cancer they are  
 22 required to have an oncologist, if they are a  
 23 child they are required to have a pediatrician,  
 24 so I just wanted to kind of share that we have,  
 25 we try to pull as many supports in, and help in

33

1 with that. So just with any patient is that  
 2 within primary care or within any type of  
 3 profession that is seeing patients, we are  
 4 trained, and that's why we also take licensing  
 5 exams that we know are going to refer.  
 6 So if we have a patient that is not  
 7 responding to therapy, we have, I mean I have  
 8 over, about six hundred individuals in my  
 9 database of referrals, whether it's for  
 10 psychiatric, like the person that I shared with  
 11 you today of, you know, I had to do a lot of work  
 12 to get that patient appropriately seen. So it  
 13 obviously is person-specific as to what's going  
 14 on, if they're not responding, we know that  
 15 that's an issue, but we're also trained if  
 16 somebody comes in and we suspect appendicitis, we  
 17 know exactly what to do for that. I don't know  
 18 if that, does that help?  
 19 **MS. HERSHKOWITZ:** It helps. A bit  
 20 of follow up. If you should be licensed, would  
 21 that change how you consider referral?  
 22 **DR. HOLLEN:** It could, depending  
 23 on the scope that is, and I can speak a little  
 24 bit to the scope since there's a few questions  
 25 about that. Within, when we put forward

34	<p>1 legislation this past session, we worked with a                  2 lot of other stakeholders to come up with                  3 language and to also have, you know, a lot of                  4 good dialogue and we recognize as, as a                  5 profession that hopefully will be licensed in the                  6 State of Virginia in the coming years, that we                  7 want everyone to recognize that we are serious                  8 about this.</p> <p>9 We want people to have faith in us                  10 and to know what we are doing, so with that scope                  11 we crafted that with a number of different                  12 stakeholders within medicine to basically provide                  13 the basics so, or the structure of, we think at                  14 least having some form of scope that includes                  15 physical exams and also imaging, and also labs is                  16 a basic, right? So those were some of the things                  17 that we crafted, not on our own, but also in                  18 collaboration with other providers out there. So                  19 our goal is to, in other states, we, you know, we                  20 work together, this is what we do, we're all in                  21 this together, so we need to keep crafting that                  22 and, and, and realize that this isn't just us                  23 putting this, this is many stakeholders coming                  24 together and that's what we did within our                  25 language, and that was the most updated language</p>	36
35	<p>1 at the last session in SC-858. Does that help?                  2 <b>MS. HERSHKOWITZ:</b> Okay, thank you.                  3 <b>CHAIRMAN WELLS:</b> She's shaking her                  4 head yes.                  5 <b>MR. SALAY:</b> I have a related                  6 question.                  7 <b>CHAIRMAN WELLS:</b> Sure, John.                  8 <b>MR. SALAY:</b> In, maybe this should                  9 have gone to the president of the association,                  10 but so with the overlap in the duties of                  11 scheduled practice with other professions, when                  12 you go through the licensing process in different                  13 states, is there pushback from say, I'm a social                  14 worker, LCSW's, or the AMA or it's a pretty well                  15 recognized that you're in the greater part of                  16 them?                  17 <b>DR. HOLLEN:</b> I would say that, and                  18 that's a great question, I would say that in                  19 different states it does vary, in Idaho and some                  20 of the other states that have recently gotten                  21 licensure, even New Mexico, the, their medical                  22 societies were definitely on board and they were                  23 also part of crafting a structure that everyone                  24 felt comfortable with. And you know, they                  25 realize that they need more providers, and so.</p>	37

1 And then for the counselors and things like that,  
 2 we have so many counselors that are sending  
 3 patients to us and we send them also plenty of  
 4 patients.

5 We work with a lot of people with  
 6 a lot of trauma because that's a need of that we  
 7 know. So much of trauma shows up on the physical  
 8 manifestation of a person, and so we, we are  
 9 trained in some counseling course, there are  
 10 those crossovers, but when there's lots of people  
 11 who are trained with pharmacotherapy or drug  
 12 therapy hitters, nurse practitioners, PA's,  
 13 PASMD's, even, of course, pharmacists, and also  
 14 ND's. So it is, you know, there's lots of things  
 15 that are shared by many different physical  
 16 partners and that's what makes medicine the  
 17 greatest, that network of providers to help one  
 18 another. We haven't had the pushback, you know,  
 19 we had a lot of physical therapy, occupational  
 20 therapists who see a lots of children with  
 21 disabilities and/or developmental delay, so we  
 22 work with a lot of different pediatric, you know,  
 23 a lot of families, and knowing also if there's an  
 24 issue we, we of course, refer as somebody touched  
 25 on earlier, but hopefully that helps.

1 **CHAIRMAN WELLS:** All right, anyone  
 2 else?  
 3 **ATTENDEES:** (No audible response.)  
 4 **CHAIRMAN WELLS:** All right, thank  
 5 you Doctor.  
 6 **DR. RACKETS:** This is Martha  
 7 Rackets.  
 8 **CHAIRMAN WELLS:** Oh okay. I'm  
 9 sorry.  
 10 **DR. RACKETS:** I had a question  
 11 as well.  
 12 **CHAIRMAN WELLS:** Sure.  
 13 **DR. RACKETS:** So my question was  
 14 around the, specifically the treatment of trauma  
 15 inside of the scope of practice. I think what  
 16 was stated earlier is that the training, kind of  
 17 the standardized training that naturopathic  
 18 doctors engage in is what allows for them to  
 19 provide the services that you do in the scope of  
 20 practice with their license, so I'm curious about  
 21 what that educational training looks like for the  
 22 treatment, the psychological treatment of trauma,  
 23 or if there are certain modalities that all ND's  
 24 are trained in at points, and what that looks  
 25 like.



38	<p>1 <b>DR. HOLLEN:</b> So that's a wonderful                  2 question. Obviously, now we, because we work                  3 with the persons as an individual and looking at                  4 trauma there can be lots of different imprints                  5 and I kind of alluded to that in my statement                  6 about transgenerational trauma where, you know,                  7 it could be alcoholism, or it could be poverty,                  8 those kinds of things that show up for people.                  9 So because we are trained in holism and                  10 prevention we are aware that instead of a woman                  11 having pelvic pain and they have seen seven                  12 different specialists, you know, that may, or                  13 eighteen multiple primary care doctors, or her                  14 OB/GYN, and maybe even seen a pelvic floor                  15 therapist or that kind of thing, sometimes they                  16 will come to us and we're like, well what else do                  17 we not know? We have a lot of time with                  18 individuals, you have at least one or two hours                  19 in most cases, and some of our colleagues won't                  20 have that privy of that time, so we can kind of                  21 really dig into things where people share things                  22 with us that they might not have shared. So what                  23 that means is, is that we recognize in our                  24 training that it's not just on their physical                  25 body that the manifestation happens, it may be</p>	40	<p>1 physical presentation, so you do a more                  2 comprehensive, like biopsychosocial, and then be                  3 able to give a more informed referral for trauma                  4 treatment as opposed to the ND doing the trauma                  5 treatment themselves?                  6 <b>DR. HOLLEN:</b> Correct. And some                  7 people may have additional training, like they                  8 might also have a secondary degree, like a                  9 counselor, with my Master's in public health                  10 right, you know, I can do a fair amount within                  11 other pieces of public health, but yes you are                  12 correct. We have some of the basics that allows                  13 us to recognize that that's what's going on                  14 versus I just don't know why you're not                  15 responding.                  16 <b>DR. RACKETS:</b> Okay, thank you,                  17 that's helpful.                  18 <b>DR. HOLLEN:</b> Yes, thank you                  19 Martha.                  20 <b>MS. JACKSON:</b> Who was that,                  21 Martha?                  22 <b>EXECUTIVE DIRECTOR CARTER:</b> That                  23 was. Martha Rackets.                  24 <b>CHAIRMAN WELLS:</b> Dr. Martha                  25 Rackets.</p>
39	<p>1 something emotional that needs to be worked with.                  2 And so we might use botanical medicine if they're                  3 having issues with sleep or pain, we might use                  4 homeopathy, we might do some things to counsel,                  5 but usually for the time that we have, you know,                  6 we have to, we have to refer out, we have people                  7 who are trained in EMDR, we have tea, those kinds                  8 of things. Getting down with someone that they,                  9 that can give them more specialized care, but we                  10 don't ignore that and just say oh I don't know                  11 why you're not responding, and not dig a little                  12 bit deeper. And we're not seeking, actually                  13 we're not seeking this as a reserve or a valley,                  14 we just want you to know that we see a lot of                  15 people because they have had lots of different                  16 therapies, they show up and they do have trauma                  17 and it has never been explored, and then in that                  18 way we can give them additional support, whether                  19 it's with a counselor or a psychiatrist, and, and                  20 referring them appropriately to have a whole                  21 system, whole. Does that help, Martha?                  22 <b>DR. RACKETS:</b> Yes, it does. So                  23 if I'm hearing you correctly its more than you                  24 are able to give the time, the time and attention                  25 to a client that perhaps has some confusing like</p>	41	<p>1 <b>EXECUTIVE DIRECTOR CARTER:</b> Dr.                  2 Martha Rackets.                  3 <b>CHAIRMAN WELLS:</b> Okay, any other                  4 questions for Dr. Hollen?                  5 <b>ATTENDEES:</b> (No audible response.)                  6 <b>CHAIRMAN WELLS:</b> Okay, thank you,                  7 Doctor.                  8 <b>DR. HOLLEN:</b> Thank you.                  9 <b>CHAIRMAN WELLS:</b> Dr. Dan Seitz?                  10 <b>DR. SEITZ:</b> Hello, I'm here, I                  11 hope that you can hear me.                  12 <b>CHAIRMAN WELLS:</b> Yes sir.                  13 <b>DR. SEITZ:</b> Great. Well thank you                  14 very much for this opportunity to testify on                  15 behalf of licensing naturopathic doctors in                  16 Virginia. My name is Daniel Seitz, I have served                  17 for sixteen years as the Executive Director for                  18 the Counsel on Naturopathic Medical Education,                  19 the U. S. Department of Education, and recognized                  20 the accrediting agency for doctoral programs in                  21 naturopathic medicine. Previously, I served as a                  22 member and board chair of the Accreditation                  23 Commission for Acupuncture and Oriental Medicine,                  24 the U. S. Department of Ed recognized accrediting                  25 agency for acupuncture. I also have formerly</p>

42	<p>1 worked for the Massachusetts Board of                  2 Registration and Medicine, where I wrote the                  3 regulations for licensing acupuncturists. So I'm                  4 very familiar with what is needed to responsibly                  5 license a healthcare field. My educational                  6 background includes a law degree and a doctorate                  7 in higher education. I would like to share a few                  8 observations. The field of naturopathic medicine                  9 has the structures in place where a state or                  10 commonwealth be able to license naturopathic                  11 doctors responsibly. The CNME, which establishes                  12 the educational standards for the field and                  13 inspects the accredited naturopathic doctoral                  14 programs to make sure that they meet the                  15 standards, is recognized by the U. S. Department                  16 of Education, which means that we have undergone                  17 a rigorous review by the Department to make sure                  18 that we meet its stringent regulations for                  19 accreditors. I just want to say that the CNME                  20 standards include required biomedical and                  21 clinical science subject matter, clinical                  22 training requirements, as well as how to refer                  23 out for conditions that are beyond the scope or                  24 ability of naturopathic doctors. The other                  25 structure that we have is the NPLEX exam,</p>	44	<p>1 Commonwealth, which could both lead to lower fees                  2 and greater accessibility of their services.                  3 This is because ND's are often hesitant to                  4 establish practices in unlicensed jurisdictions.                  5 Finally, it is difficult for the public to                  6 distinguish who is a legitimate naturopathic                  7 doctor and who isn't, in the absence of                  8 licensure. There is still diploma mill programs                  9 out there, some of which are entirely online, and                  10 accreditation mills that purport to accredit                  11 them. These substandard programs pose another                  12 risk to the public in the absence of licensure.                  13 I find that I often that I would receive phone                  14 calls from confused consumers, asking questions                  15 about credentials. On a personal note, I would                  16 like to say that I have been thirty years                  17 involved with natural medicine education,                  18 regulation, and accreditation because I feel that                  19 it is an important and perfect complement to what                  20 conventional medicine as to offer to the public.                  21 Thank you again for this opportunity to testify.                  22 <b>CHAIRMAN WELLS:</b> Thank you. Any                  23 questions for Dr. Seitz?                  24 <b>ATTENDEES:</b> (No audible response.)                  25 <b>CHAIRMAN WELLS:</b> Dr. Seitz. Ms.</p>
43	<p>1 referred to previously, that the national                  2 licensing exam for naturopathic doctors. It is                  3 well established and has a successful track                  4 record of use in licensed jurisdictions in the                  5 U.S. and Canada. All of the ND programs in the                  6 U.S. are housed within colleges and universities                  7 that have institutional accreditation by a                  8 recognized accreditor, which means there is in                  9 place an important additional oversight mechanism                  10 to insure quality education. In Canada, ND                  11 programs are in institutions approved by their                  12 respective provincial departments of education.                  13 Finally, doctoral degrees are all state approved.                  14 While there is less, there is somewhat less risk                  15 that naturopathic medical therapies may cause                  16 harm to patients due to the generally less                  17 invasive nature of natural interventions,                  18 nonetheless any therapies can cause harm, harm to                  19 patients if misused by practitioners with                  20 inadequate training. Harm is also possible when                  21 naturopathic medicine is practiced by                  22 inadequately trained individuals who fail to                  23 deliver the benefits of effective therapy.                  24 Licensing ND's will likely lead to an increase in                  25 the number of naturopathic practitioners in the</p>	45	<p>1 Carter?                  2 <b>EXECUTIVE DIRECTOR CARTER:</b> I'm                  3 good, I'm good.                  4 <b>CHAIRMAN WELLS:</b> Okay. Thank you,                  5 sir.                  6 <b>DR. SEITZ:</b> You're welcome. Thank                  7 you.                  8 <b>CHAIRMAN WELLS:</b> Next we will hear                  9 from Dr. Marie Rodriguez.                  10 <b>DR. RODRIGUEZ:</b> Can you hear me                  11 now?                  12 <b>EXECUTIVE DIRECTOR CARTER:</b> Yes.                  13 <b>CHAIRMAN WELLS:</b> Yes ma'am.                  14 <b>DR. RODRIGUEZ:</b> My name is Dr.                  15 Marie Rodriguez, I'm the Vice President of the                  16 VAANP, and I'm a native of Fairfax, Virginia.                  17 Thank you to the Board for your volume of work                  18 report and for the opportunity to speak about my                  19 profession today. I completed a Bachelor degree                  20 and graduated from the University of Virginia in                  21 1995, and my doctorate in naturopathic medicine                  22 from Bastyr University in 2002. I have been in                  23 solo private practice in the District of Columbia                  24 since 2004. For the past sixteen years I have                  25 practiced NDC while residing in Arlington,</p>

46	<p>1 Virginia. I choose to do business in D.C. as a                  2 nonresident because of the benefit the practice                  3 makes in a licensed jurisdiction. In D.C. I can                  4 order labs and I can perform routine physical                  5 exams. I also have a scope that includes some                  6 prescribing rights. With licensing, I have been                  7 able to practice the important scope of my                  8 domain. We are therefore able to offer more to                  9 my patients. I don't have to tell my patients go                  10 get this lab done elsewhere, or to go see this                  11 doctor for a basic prescription for diagnostic                  12 imaging. It saves times, it lowers costs, and it                  13 enables me to do my job thoroughly and therefore                  14 it improves patient outcomes. I am one of close                  15 to ten ND's that live in Virginia, yet commute to                  16 a practice. This is taking away from the local                  17 economy in Virginia, and it will only continue to                  18 do so as naturopathic medicine continues to grow.                  19 The legislative got behind our license to operate                  20 in 2020 interlaced organically with the criteria                  21 set forth by the Board. To expand that class of                  22 naturopathic medicine reliant people medically                  23 trained as doctors who commonly diagnose and                  24 treat under a defined scope of practice. To                  25 protect public safety and promote transparency, I</p>	48	<p>1 naturopath. I wanted to also add a quick                  2 response about the areas of focus withstood by                  3 the Board on Page 11. This is expanded upon                  4 further in our comments. ND's are trained in a                  5 variety of healthcare services, however, given                  6 the current restrictions in Virginia, and the                  7 lack of a defined scope of practice, those                  8 services outside of current parameters are only                  9 handled with referrals to and discussed in                  10 collaboration with other licensed healthcare                  11 partners. Thank you so much for your time. I                  12 ask the Board to recognize and license                  13 naturopathic doctors in Virginia.                  14 <b>CHAIRMAN WELLS:</b> Thank you.                  15 Anyone have any questions for Dr. Rodriguez?                  16 <b>MS. HERSHKOWITZ:</b> Yes, Mr. Chari.                  17 <b>CHAIRMAN WELLS:</b> Yes ma'am.                  18 <b>MS. HERSHKOWITZ:</b> This is Louise                  19 Hershkowitz. Dr. Rodriguez, you were one of                  20 those that I was suggested to ask about this, so                  21 I will. One of the questions I have more broadly                  22 is among, and I suspect you have looked at other                  23 states and what they permit, is there a model                  24 that you think would be most appropriate in                  25 Virginia?</p>
47	<p>1 differentiate in regulations between a medically                  2 trained naturopathic doctor and traditional or                  3 lay naturopath. And to protect the public from                  4 risk by, recourse is available if we would harm                  5 for any practical matter. To recognize that why                  6 the training of ND's are reserving the                  7 naturopathic doctor title for those who have                  8 earned doctoral degrees for naturopathic                  9 medicine, medical programs accredited by bodies                  10 recognized by the U. S. Department of Education.                  11 I would like to take the opportunity to state                  12 that licensing naturopathic doctors will not                  13 prohibit traditional or lay naturopaths. They                  14 will be able to do their work and consult them                  15 about natural therapies. The VAANP recognizes                  16 that many of the modalities used by medically                  17 trained naturopathic doctors are also used widely                  18 and by medically traditional healers. These                  19 modalities are not exclusive to medically trained                  20 naturopathic doctors. We are mindful and                  21 respectful of the importance of place in                  22 accessing traditional healing for community                  23 health, while at the same time we acknowledge                  24 that ND's have a scope of training and education                  25 that sets us apart from the traditional</p>	49	<p>1 <b>DR. RODRIGUEZ:</b> I believe that the                  2 outline of that in SC-858, and we can bring that                  3 to your attention through our written comments.                  4 In Virginia, to my knowledge, we are, we are                  5 asking for a scope that is more limited that                  6 actually what we or Maryland have, where we will                  7 not be primary care providers and all that, my                  8 colleagues can get into that in more detail and                  9 like I said, all of your, all of that we are                  10 asking for is detailed in the legislation                  11 involved in the last session.                  12 <b>MS. HERSHKOWITZ:</b> And you talked                  13 about your ability to prescribe in D.C. being                  14 limited, what kind of limitations are there and                  15 what again do you anticipate in Virginia?                  16 <b>DR. RODRIGUEZ:</b> So I understand                  17 that we won't, to my knowledge, we won't have                  18 prescribing rights. In D.C., I mean when you                  19 prescribe thyroid hormone, thyroid replacement                  20 and bioidentical hormones.                  21 <b>MS. HERSHKOWITZ:</b> So you use other                  22 naturopathic items that you are able to                  23 prescribe, or are they basically all over the                  24 counter?                  25 <b>DR. RODRIGUEZ:</b> Primary all over</p>

50	<p>1 the counter, though the medicines that I, the                  2 botanical medicine coming out I would prefer to                  3 refer my patients to sources that I trust and                  4 that their quality has been tested, many of which                  5 are found at a CVS or a local grocery store.                  6 <b>MS. HERSHKOWITZ:</b> Thank you.                  7 <b>DR. RODRIGUEZ:</b> You're welcome.                  8 <b>MR. SALAY:</b> I want to follow up on                  9 that. Why are you all taking the less, the more                  10 restrictive path in Virginia?                  11 <b>DR. RODRIGUEZ:</b> The more                  12 restrictive the path in terms of licensing,                  13 right?                  14 <b>MR. SALAY:</b> The scope of practice.                  15 <b>DR. RODRIGUEZ:</b> We work alongside                  16 with other, other parties, and, and determine the                  17 best path forward for us at this time. And we                  18 can elaborate in more detail if that's needed.                  19 <b>MS. HERSHKOWITZ:</b> This is Louise                  20 Hershkowitz, I would like you to elaborate,                  21 please.                  22 <b>DR. RODRIGUEZ:</b> So, as you know we                  23 have been working on this effort since 2005 and I                  24 am a longstanding, or a member of the Virginia                  25 Association of Naturopathic Physicians, and in</p>	52	<p>1 well. Obviously if something comes in with                  2 cellulitis, they're going out to the ER or to an                  3 emergent care facility. I don't know if that                  4 helps or if that was a little bit more confusing.                  5 <b>MS. HERSHKOWITZ:</b> Thank you.                  6 <b>CHAIRMAN WELLS:</b> Thank you.                  7 <b>EXECUTIVE DIRECTOR CARTER:</b> This                  8 is Elizabeth Carter, just asking, you know, so                  9 many of the states do have a very specific                  10 formulary, whether its prescription drugs or                  11 whether it is botanicals. Do you all recommend a                  12 specific formulary or are you asking for it to be                  13 just broader?                  14 <b>DR. RODRIGUEZ:</b> I'm sorry, I'm                  15 not...                  16 <b>EXECUTIVE DIRECTOR CARTER:</b> I'm                  17 sorry, let me get the. As you know, many states                  18 actually have a listed formulary and that                  19 includes not just prescription drugs, or legend                  20 drugs, but also the botanicals, and other things.                  21 Would you, are you recommending consideration of                  22 a formulary or are you, does this group just want                  23 to leave it more broadly?                  24 <b>DR. RODRIGUEZ:</b> We're not                  25 recommending, at this time we're not recommending</p>
51	<p>1 speaking with other parties or different                  2 organizations, whether it be the Medical Society                  3 of Virginia, chiropractors, counselors,                  4 nutrition, lay naturopath, we have determined                  5 that our, we negotiated this, this path, and                  6 that's how we determined for that word being that                  7 if we were asking for a doctor's scope it                  8 wouldn't be efficacious to getting licensed at                  9 the time. Right now we can do a lot, we would be                  10 able to do a lot more with being able to order                  11 routine bloodwork, be, or were able to order                  12 diagnostic imaging, to be able to legally touch                  13 our patients. There's so much that we can do                  14 within the breadth of a naturopathic, our, our                  15 range of prescribing within what we already have                  16 that's not restricted through prescription is                  17 very vast, and there's a lot we can do without                  18 the use of pharmaceutical drugs. I rarely need                  19 to use those in my practice, or if it's needed,                  20 then I would usually refer somebody out. I have                  21 actually found over the eighteen years of my                  22 practice of botanical medicine is, is really                  23 powerful and when we take a first, you know,                  24 pharm, why could somebody want an antibiotic                  25 when a botanical prescription works for them as</p>	53	<p>1 a formulary.                  2 <b>EXECUTIVE DIRECTOR CARTER:</b> Thank                  3 you.                  4 <b>DR. RODRIGUEZ:</b> Thank you.                  5 <b>CHAIRMAN WELLS:</b> Okay, any further                  6 questions?                  7 <b>ATTENDEES:</b> (No audible response.)                  8 <b>CHAIRMAN WELLS:</b> Okay. Thank you,                  9 Doctor.                  10 <b>DR. RODRIGUEZ:</b> Thank you.                  11 <b>CHAIRMAN WELLS:</b> Okay, next we                  12 will hear from Dr. Carrie Runde, Runde?                  13 <b>DR. RUNDE:</b> Hi, good morning, can                  14 you hear me?                  15 <b>CHAIRMAN WELLS:</b> Yes.                  16 <b>DR. RUNDE:</b> Hi, thank you. My                  17 name is Carrie Runde and I'm a naturopathic                  18 doctor practicing in Baltimore. I hold licenses                  19 to practice naturopathic medicine in Maryland as                  20 well as in Washington, D.C. I have worked in a                  21 variety of outpatient settings including very                  22 large and great medical practices with many                  23 providers, other specialists, counselors, and                  24 psychologists, nutritionists, chiropractors.                  25 Currently I work in smaller practice with another</p>

54	<p>1 naturopathic doctor and a psychologist.                  2 I have served on the Board of the                  3 American Association of Naturopathic Physicians                  4 as well as being a past vice president of the                  5 Maryland Naturopathic Doctor's Association. I                  6 wanted to offer the experience we have here in                  7 Maryland. I've been highly involved in this                  8 since it started about ten years ago.                  9 I was a participant, I was in                  10 licensure as well as the summer study process,                  11 licensure process as well as to writing our                  12 regulations and now as their, in advisory and                  13 regulatory roles. Licensure is working very                  14 well. It has benefitted the public so there's                  15 clarity around training and our role. When they                  16 come to see us they know our face, actually.                  17 It's also educational for                  18 healthcare because it provides a very clear and                  19 legitimate cleanup where other healthcare                  20 providers confidently refer for naturopathic                  21 healing, and in my practice this has really, we                  22 passed our licensure in 2014 and started issuing                  23 those in 2016. The most important reason is                  24 public safety. Without license, there were these                  25 vast differences in the clinical training, more</p>	56	<p>1 course with a full year in an accredited medical                  2 school, but without regulation the public has,                  3 doesn't see anything different. So here in                  4 Maryland it's turning to be a public safety                  5 issue. Not regulated, it allows us, it allows                  6 people that use naturopathic titles and lay                  7 naturopaths have a very standardized training in                  8 school. It also gives us this frank, to regulate                  9 the profession, whereby we have disciplinary                  10 action, this benefits the public and it benefits                  11 the healthcare system. Again, there's confusion                  12 about what we do and how we fit in.                  13 I also want to verify one thing                  14 that came up that in Maryland a naturopathic                  15 doctor to work to work independently in practice,                  16 work autonomously as do the other licensed                  17 jurisdictions. Trying to operate within the                  18 existing healthcare, I have to refer when I need,                  19 as I mentioned, in Maryland we have this very                  20 unique collaboration agreement with the                  21 conventional medical division, and what this is,                  22 is an ND on his license has to list an MD who is                  23 willing to serve as a clinical resource, not                  24 supervision. It's simply an MDPO and he or she                  25 has physical contact information for aggregated</p>
55	<p>1 people advertise themselves using alphabetic                  2 titles in there.                  3 This was a significant issue on                  4 cases for me to no to try, but it's still a big                  5 issue for patients who moved to or from another                  6 state that the patient does not have a doctor.                  7 We have, our doctors have this very unique                  8 skillset and it is in demand, framed a bridge                  9 between the world of conventional medicine and                  10 the natural world of naturopathic and holistic                  11 medicine, and the efforts to appropriately                  12 utilize lifestyle and natural medicines to treat                  13 health conditions within the nexus of one's                  14 overall health, including understanding their                  15 piece in that. And these skills are very                  16 necessary when they have clients who do this.                  17 Patients are searching online for providers in                  18 their area trained in holistic medicine.                  19 They want to treat things like                  20 allergies and hypertension, and without                  21 regulation they just end up seeing a provider who                  22 could have different providers who could have the                  23 same public-facing name or have an ND, which have                  24 this vastly different level of training, right.                  25 There was an online sixteen hour naturopath</p>	57	<p>1 consultation.                  2 The MD or DO's referenced there                  3 were at least indirectly in the care of the                  4 patient and there are no requirements around                  5 often an ND with their collaborating MDPO and if                  6 they have to. And so the requirement, I want to                  7 say that those who are seeking naturopathic                  8 medical care, we see that they travel to our                  9 practice, even Baltimore, because they know I                  10 have a license and what role I can play in their                  11 healthcare. However, I believe that the patients                  12 are staying locally in Virginia where there is                  13 now over forty trained naturopathic doctors. So                  14 thank you for your time and I would be happy to                  15 answer questions.                  16 <b>CHAIRMAN WELLS:</b> Thank you,                  17 Doctor. Dr. Carter?                  18 <b>MR. SALAY:</b> I want to know...                  19 <b>CHAIRMAN WELLS:</b> Go ahead.                  20 <b>MR. SALAY:</b> ... that presentation,                  21 thank you for the, do you indicate that the ND                  22 have a bigger role in the consulting realm?                  23 <b>DR. RUNDE:</b> Regarding the                  24 collaboration agreement? I do not, I think that                  25 the collaboration agreement here was created with</p>

58	<p>1 this idea that a naturopathic doctor, or this, I                  2 think kind of admits that's been a confusion that                  3 naturopathic doctors would exist almost like an                  4 island, or that we wouldn't refer, we wouldn't                  5 have a reason to collaborate when, you know, as                  6 someone who has been licensed in the State of                  7 Maryland would have, I haven't consulted with my                  8 collaborating physician once, not because                  9 clinical patients don't arise, so because I'm                  10 directing them to a specialist or a provider, or                  11 urgent care, or the ER, so I think it's a little                  12 bit administrative. We don't recommend                  13 collaborations because I don't think they are                  14 actually serving very good. Did I answer your                  15 question?                  16 <b>MR. SALAY:</b> Yes. Yes, thank you                  17 very much.                  18 <b>CHAIRMAN WELLS:</b> Dr. Carter?                  19 <b>EXECUTIVE DIRECTOR CARTER:</b> Yes,                  20 this is Liz Carter again. In terms of                  21 accountability, I think with the collaborative                  22 practice typically there's malpractice insurance                  23 that's covered by one party versus another,                  24 that's just in other professions, but so do ND's                  25 in Maryland have malpractice coverage for</p>	60
59	<p>1 students.                  2 The Medical Society has clear                  3 policy imposing licensure for naturopaths and                  4 naturopathic doctors. During the legislative                  5 session we raised great communications safety                  6 concerns to the legislators as well as the                  7 Department of Health Professions, and those most                  8 certainly remain.                  9 Looking at the DHP report for us,                  10 there were two areas we believe naturopaths are                  11 in the criteria for licensure. First, by rule,                  12 licensure in the Commonwealth of Virginia                  13 requires highly specialized post-secondary                  14 education and clinical efficiency, and clinical                  15 efficiently certified by an accredited body.                  16 Stated in the 2020 report, the Department of                  17 Education does accredit the natural, the National                  18 Naturopathic Medical Association but recognition                  19 as an accrediting agency by DOE does not                  20 constitute endorsement of the educational                  21 institution or program.                  22 The medical community maintains                  23 that the lack of accountability and transparency                  24 in the training of naturopaths and naturopathic                  25 doctors has a high potential for risk for patient</p>	61
58	<p>1 themselves?                  2 <b>DR. RUNDE:</b> Yes, I can remember,                  3 there's insurance.                  4 <b>EXECUTIVE DIRECTOR CARTER:</b> Okay,                  5 thank you.                  6 <b>DR. RUNDE:</b> Um hmm (indicating                  7 affirmatively.)                  8 <b>CHAIRMAN WELLS:</b> Okay, any further                  9 questions?                  10 <b>ATTENDEES:</b> (No audible response.)                  11 <b>CHAIRMAN WELLS:</b> Okay. Thank you,                  12 Doctor.                  13 <b>DR. RUNDE:</b> Thank you.                  14 <b>CHAIRMAN WELLS:</b> Our next speaker,                  15 Dana Kleinschuster? I hope I got that right.                  16 <b>EXECUTIVE DIRECTOR CARTER:</b> I                  17 don't see Dr. Kleinschuster on the list.                  18 <b>CHAIRMAN WELLS:</b> Okay. All right,                  19 we will move forward to Clark Barrineau.                  20 <b>MR. BARRINEAU:</b> Close enough.                  21 Good afternoon, everyone, this is Clark Barrineau                  22 of the Medical Society of Virginia. Thank you                  23 for having us today. As you well know, the                  24 Medical Society represents Virginia's physicians,                  25 physician assistants, residents, and medical</p>	61



62	<p>1 counselors, psychologists, dieticians,                  2 nutritionists, physical therapists,                  3 acupuncturists and chiropractors are all already                  4 living and working in the Commonwealth,                  5 regulating license of ND's is the equivalent of                  6 these professions. As there are already existing                  7 legal protections for patients who are in                  8 treatment by doctors the MSV maintains the                  9 licensure communicates an inaccurate picture of                  10 legitimacy in the patient community and does not                  11 increase accountability to protect public health                  12 and safety. The Medical Society is fully opposed                  13 to the licensure of naturopathic doctors and the                  14 physician community looks forward to commenting                  15 further as the process moves along. Thanks.                  16 <b>CHAIRMAN WELLS:</b> Thank you. Any                  17 questions?                  18 <b>MS. HERSHKOWITZ:</b> Yes. Mr.                  19 Barrineau, you talked about outside, the due                  20 processes for curriculum and testing, what kinds                  21 of sources are you talking about?                  22 <b>MR. BARRINEAU:</b> We are just                  23 looking at the one we know well, which is                  24 physician education, physician testing, it is                  25 vetted by a great many third party sources,</p>	64
63	<p>1 including the government and national                  2 associations representing not just physicians but                  3 insurance and hospitals, who traditionally, the                  4 government, and the education is vetted about as                  5 much as any level of education and craft besides                  6 a lawyer, and so when we look and say there is                  7 accreditation for these, we need to know really                  8 what that is other than what it appears to be,                  9 which in my mind is just a simple blessing of the                  10 program itself and not a blessing of curriculum,                  11 and training, and patient safety.                  12 <b>MS. HERSHKOWITZ:</b> And are you                  13 aware of, since you are clearly opposed to this,                  14 are you aware of situations in which there have                  15 been demonstrated problems with safety in the                  16 public?                  17 <b>MR. BARRINEAU:</b> We are aware of                  18 other licensed naturopathic doctors who have                  19 administered treatments in other states that were                  20 not scientifically proven to be correct, you all                  21 made some mention of that in the 2020 report and                  22 we can certainly pull those together, I don't                  23 think will help the Board at all.                  24 <b>MR. SALAY:</b> I have a question too.                  25 Wouldn't your arguments hold for the other side</p>	65

1 of the case just as easily, that the practice is  
 2 potentially harmful and if it's not licensed then  
 3 we have no oversight of it?  
 4 **MR. BARRINEAU:** To your point, you  
 5 know, we brought the issues of education and its  
 6 scope per the way the report was written. The  
 7 report says in order to obtain licensure you need  
 8 a highly specialized and accredited education,  
 9 and you know, it defines scope. We, we're, we  
 10 will give away the ghost on the first  
 11 requirement, patient harm, however, we believe  
 12 that if we are saying the education is deficient  
 13 to treat patients, the question that I think is  
 14 not necessarily explored in the 2020 report, and  
 15 one that we would take umbrage with. Certainly I  
 16 think the existence of patient harm does exist,  
 17 but as I mentioned towards the tail end of my  
 18 testimony, there are already patient protections  
 19 from, from receiving inadequate care through the  
 20 legal process.  
 21 **CHAIRMAN WELLS:** Thank you, any  
 22 further questions?  
 23 **ATTENDEES:** (No audible response.)  
 24 **CHAIRMAN WELLS:** Okay. Thank you,  
 25 sir. The next speaker is John Hanks.

1 **MR. HANKS:** Can you hear me?  
 2 **CHAIRMAN WELLS:** We can, sir.  
 3 **MR. HANKS:** Okay, thank you.  
 4 Well, my name is John Hanks, I am with Virginians  
 5 for Health Freedom and I have a comment regarding  
 6 the licensure of naturopathic doctors regarding  
 7 two of the seven criteria.  
 8 The first criteria, one, the risk  
 9 for harm to the consumer. The current natural  
 10 health activity in Virginia not licensed as we  
 11 feel it should be. Practitioners are limited to  
 12 suggesting herbs, vitamins and natural remedies  
 13 to consumers and this does not pose a risk of  
 14 harm to the public.  
 15 These traditional practitioners  
 16 cannot diagnose illness or disease, prescribe any  
 17 drug or medical treatment, or otherwise practice  
 18 medicine. All of their interactions with  
 19 consumers are voluntary. The consumer chooses  
 20 whether or not to seek advice on natural products  
 21 or remedies, and whether or not to purchase any  
 22 natural product, natural health product.  
 23 Products and remedies that are available through  
 24 natural health practitioners are legal and  
 25 readily available for purchase over the counter



66	<p>1 from any retail businesses, including Walmart,                  2 CVS, Costco, via the internet, et cetera.                  3 Manufacturers of these products                  4 are required by the FDA to insure they are safe                  5 before they become available to the public. The                  6 unregulated practice of traditional medicine or                  7 natural health does not harm or endanger the                  8 public health, safety, or welfare. There is no                  9 harm, they are simply out there for natural                  10 products and remedies.                  11 On Criterion 5, economic impact,                  12 in Virginia today all natural health                  13 practitioners do essentially the same thing, they                  14 can suggest and/or sell natural health products                  15 and remedies without the need of a license. A                  16 license is recommended and became law in                  17 Virginia, the small group desiring licensure                  18 could result in a restriction of the supply of                  19 practitioners for the consumers and the general                  20 public. For example, Trinity School of National,                  21 Natural Health, just graduated one hundred and                  22 fifty-one traditional naturopathic doctors in                  23 Virginia alone, more than three times the number                  24 requesting licensure.                  25 In addition, they have a program</p>	68	<p>1 hearing you say that you want to assure that                  2 traditional natural health providers continue to                  3 be able to do what they do and not be restricted                  4 in the legislation? Is that the position you are                  5 advocating?                  6 <b>MR. HANKS:</b> I'm sorry, I only got                  7 the last bit of that.                  8 <b>MS. HERSHKOWITZ:</b> Okay, I will                  9 repeat my question, it's a little long.                  10 <b>MR. HANKS:</b> Okay.                  11 <b>MS. HERSHKOWITZ:</b> I'm hearing you,                  12 can you hear me now?                  13 <b>MR. HANKS:</b> Yes.                  14 <b>MS. HERSHKOWITZ:</b> I'm hearing you                  15 advocate that the traditional naturopathic health                  16 providers in Virginia not be restricted if there                  17 is any legislation regarding naturopathic                  18 doctors, is that correct?                  19 <b>MR. HANKS:</b> Yes, yes.                  20 <b>MS. HERSHKOWITZ:</b> Are you also                  21 opposing the licensure of naturopathic doctors,                  22 and if so, why?                  23 <b>MR. HANKS:</b> We oppose it if it                  24 does not have protection for the, public. With                  25 protection, we do not oppose it.</p>
67	<p>1 that produces certified natural health                  2 professionals and have graduated four hundred and                  3 fifty-eight of those in Virginia also. And there                  4 are also a number of health coaches from various                  5 schools in Virginia. All of these traditional                  6 naturopathic doctors are natural health                  7 professionals and health coaches exclusive for                  8 natural health. They have no need or desire to                  9 branch into the medical practices. Their                  10 training is also extensive.                  11 If you choose to recommend                  12 licensure, we request that you mandate protection                  13 for the unlicensed practitioner in the state                  14 today. We have negotiated language in SB-858                  15 that helps protect the unlicensed practitioner                  16 and their livelihood. Thank you.                  17 <b>CHAIRMAN WELLS:</b> Thank you, sir.                  18 Are there any questions?                  19 <b>MS. HERSHKOWITZ:</b> Mr. Chair, I do                  20 have a question.                  21 <b>CHAIRMAN WELLS:</b> Yes ma'am.                  22 <b>MS. HERSHKOWITZ:</b> This is Louise                  23 Hershkowitz.                  24 <b>CHAIRMAN WELLS:</b> Sure.                  25 <b>MS. HERSHKOWITZ:</b> Mr. Hanks, I'm</p>	69	<p>1 <b>MS. HERSHKOWITZ:</b> Thank you.                  2 <b>MR. HANKS:</b> You're welcome.                  3 <b>CHAIRMAN WELLS:</b> Are there any                  4 other questions?                  5 <b>ATTENDEES:</b> (No audible response.)                  6 <b>CHAIRMAN WELLS:</b> I do have Leah                  7 Hollen, Dr. Leah Hollen, who would like to                  8 respond, and I'm going to allow that so that we                  9 don't hold her to the very end. Go ahead,                  10 Doctor.                  11 <b>DR. HOLLEN:</b> Sorry for that, it                  12 might have been from earlier, I was just going to                  13 let you know that one of our people that was                  14 testifying had to pop off when you called them,                  15 but I guess that was from a while ago that a hand                  16 was raised, but I will say we have worked with                  17 and, and Mr. Hanks presents one of the state                  18 groups and we did craft language to NSB-858 to                  19 make sure that we did accommodate or not                  20 restricting lay providers, we just wanted to be                  21 mindful of that. Thank you.                  22 <b>CHAIRMAN WELLS:</b> Okay, thank you.                  23 <b>DR. KACHKO:</b> And Dr. Hollen, if                  24 that was me, this is Dr. Kachko, if that were me                  25 you're referring to, I'm back, I'm just popping</p>

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1 in and out with patients, I'm sorry.  
 2 **CHAIRMAN WELLS:** Would you  
 3 identify yourself, the person who just spoke?  
 4 I'm sorry, would you identify yourself, the  
 5 person who just last spoke saying you were back?  
 6 **DR. KACHKO:** Sure. Dr. Robert  
 7 Kachko, American Association of Athletic  
 8 Physicians, I'm popping in and out with patients,  
 9 so I don't know if there was a question earlier  
 10 that Dr. Hollen had alluded to, but I'm happy to  
 11 answer that now if there was.  
 12 **EXECUTIVE DIRECTOR CARTER:** I  
 13 think we're just doing it for the record to make  
 14 sure who was available.  
 15 **CHAIRMAN WELLS:** Yes. Yes sir.  
 16 **EXECUTIVE DIRECTOR CARTER:** Thank  
 17 you.  
 18 **CHAIRMAN WELLS:** Okay, John, is  
 19 that?  
 20 **MR. SALAY:** Is it okay if I ask  
 21 Dr. Kachko a question?  
 22 **CHAIRMAN WELLS:** Sure.  
 23 **MR. SALAY:** Okay. What do, I  
 24 don't know if you heard when you were out with  
 25 patients that the Medical Society is concerned

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1 about there not being an oversight body  
 2 independent of your profession that looks over  
 3 the graduate programs, or the education programs?  
 4 **DR. KACHKO:** Sure. So that might  
 5 be a question, if Dr. Seitz is still on, he might  
 6 be able to better address that from the CNME  
 7 perspective. What I can say is that, you know,  
 8 in many states the medical society sometimes, you  
 9 know, poses the question on whether there should  
 10 be licensure, but we work in a very collaborative  
 11 settings, we work with ND's and DO's all the time  
 12 and so there, there should not be any concern  
 13 over infringing on scope or anything like that, I  
 14 have mentioned earlier, we refer regularly to  
 15 providers. As far as education, I would defer to  
 16 Dr. Seitz if he is available.  
 17 **DR. ROBERT SEITZ:** I am available  
 18 if the Committee would like me to participate.  
 19 **CHAIRMAN WELLS:** Can you remain on  
 20 the line Dr. Seitz? I would like to get through  
 21 everyone's initial comments first and then we  
 22 will circle back, if that's okay, and Mr. Salay  
 23 if that's okay, we will...  
 24 **DR. KACHKO:** All right, sure.  
 25 **MR. SALAY:** Sure.

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1 **CHAIRMAN WELLS:** All right, Dr.  
 2 Decker Weiss?  
 3 **DR. WEISS:** Hello everybody, I  
 4 appreciate everybody taking time to look over the  
 5 professions and really get an opportunity for the  
 6 people of Virginia to experience naturopathic  
 7 care, the level of which these doctors are  
 8 accredited for. My background real quick is, I  
 9 graduated from Southwest College, one of the  
 10 accredited schools, in 1997. I went on to do a  
 11 conventional internship and residency and  
 12 fellowship. My fellowship was in cardiology and  
 13 noninvasive cardiology, although I, a lot of  
 14 practicing cath labs, when you are a resident or  
 15 a fellow you do whatever is needed. And so I did  
 16 a residency, fellowship in cardiology and I  
 17 stayed on staff with the Arizona Heart Hospital  
 18 for ten years as a cardiologist. I had a very  
 19 big practice, cardiovascular based for twelve  
 20 years in Scottsdale, I sold it and I launched a  
 21 nonprofit called Peace Possible, which has now  
 22 worked into something called Global Medical,  
 23 where we have researched radicalization cycles of  
 24 violence, cycles of poverty, and administer care  
 25 of refugees, recovered sex workers and so on, so

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1 I am often now in places like Erbil, Iraq and  
 2 the, the, to Thailand and other places like that.  
 3 My legislative experience is  
 4 minimal, but I think that maybe I would draw some  
 5 interest for this committee. We had, we had a  
 6 long, expensive while in nineteen, since 1985  
 7 that's worked really, really well in the State of  
 8 Arizona. In the mid-nineties, in the early two  
 9 thousands it came under challenge. The  
 10 Legislature was faced with the challenge and it  
 11 basically said, it's okay but they shouldn't  
 12 prescribe. And so the Legislature kicked it off  
 13 to the Boards, and the Boards basically said we,  
 14 it's just more of an infighting, no but it might  
 15 be, you know, more of a turf war. You know, as  
 16 you know you have to maintain your independence,  
 17 and you have to look at everything thoroughly.  
 18 So I was appointed to a committee  
 19 body or legislature, along with the head of  
 20 Palmer College, it's the University of Arizona  
 21 medical doctors, to look at whether we should be  
 22 prescribing. And one of the interesting things  
 23 that came out of it, we never had any complaints  
 24 in all of that time. And another thing that came  
 25 out was, you know, naturopaths that didn't want

74	<p>1 to use pharmaceuticals didn't, and the ones that                  2 did, did it quite well and quite safely, and that                  3 is with over fifteen years of experience, so it's                  4 not that small of a size. So we don't keep up                  5 with Chris Lucci because everybody hated him.                  6 Nobody liked this, my colleague stated that we're                  7 going to have to remove the, but basically it was                  8 is we reviewed all of, all of them, and those                  9 that wanted to prescribe but had to meet some                  10 educational or government acid test, and if they                  11 did that then they got to prescribe. And they                  12 found about thirty percent of naturopaths had no                  13 use in prescribing, but wanted to do the                  14 diagnostics, the physical exam skills, all of                  15 those things. They proved their expertise to the                  16 Legislature and passed that.                  17 Recently, I've been also in two                  18 sessions, one is going to do about this for                  19 COVID-19 relief, I have not only been                  20 instrumental trying to set up Arizona policy for                  21 COVID-19, and reviewed the natural protocol,                  22 which is an agreed protocol including ascorbic                  23 acid IV's, melatonin, Vitamin D used in emergency                  24 rooms and in ICU's, but I was called into review                  25 that to see if that was safe, and effective, more</p>	76	<p>1 equally by medical doctors as naturopathic                  2 doctors.                  3 Medical doctors gave me more                  4 opportunity to become a cardiologist, that wasn't                  5 something that was available for a naturopathic                  6 physician. I'm indebted to everybody and                  7 thankful to everybody in the medical profession,                  8 and I just hope that we see fit for the good                  9 people of Virginia to get naturopathic care. And                  10 I will take time for any questions and any                  11 available if anybody wants.                  12 <b>CHAIRMAN WELLS:</b> Thank you,                  13 Doctor. Any questions for Dr. Weiss?                  14 <b>MR. HANKS:</b> Can I clarify a                  15 question that came up earlier or a confusion?                  16 <b>EXECUTIVE DIRECTOR CARTER:</b> Who is                  17 this?                  18 <b>MR. HANKS:</b> We...                  19 <b>EXECUTIVE DIRECTOR CARTER:</b> I'm                  20 sorry, identify yourself. I'm sorry, we're                  21 recording this, please identify who you are.                  22 <b>MR. HANKS:</b> This is John Hanks.                  23 <b>EXECUTIVE DIRECTOR CARTER:</b> Thank                  24 you, sir.                  25 <b>MR. HANKS:</b> I was just speaking,</p>
75	<p>1 importantly, and effective, and agreed use of                  2 dollars, and those things. And also recently I                  3 have been called to Health &amp; Human Services to                  4 testify on some of the research I have performed                  5 in human trafficking and you know, chronic                  6 inflammatory states, I've been in that as long,                  7 and to answer, we were resistant. So my input                  8 for this Committee is who really, it's very hard                  9 when you have all these organizations in front of                  10 you to really sort it out.                  11 Really, to figure out what it was                  12 to be a naturopathic medical student in the day                  13 in their life while they are in school, it's a                  14 long training process, it's for school for,                  15 working with a fifth intern year, running through                  16 the summers and then after, and a good chunk of                  17 all are all residents at this. And so the, the                  18 training aspect I think would be something that                  19 might be worth looking at.                  20 The last thing that I have to say,                  21 if I can be of any use to this Committee, to Dr.                  22 Carter, Nurse Hershkowitz, in helping craft, you                  23 know, where did Arizona go with this, why did                  24 they have this, how did they go through this on                  25 this exposed, I'm available. And I was trained</p>	77	<p>1 I'm sorry.                  2 <b>EXECUTIVE DIRECTOR CARTER:</b> That's                  3 all right.                  4 <b>MR. HANKS:</b> Leah mentioned that                  5 we've worked together and we have, and we're very                  6 thankful for her efforts for protecting the                  7 unlicensed folks and SB-858, because one of the                  8 concerns we have is there a companion bill in the                  9 House, HB-1040 that has no protective language in                  10 it. And this would be incredibly harmful for the                  11 thousands of unlicensed workers. So if that                  12 clarifies it. I do appreciate what Leah Hollen                  13 and her group have done in SB-858 but we were not                  14 as successful on the other side. Thank you.                  15 <b>CHAIRMAN WELLS:</b> Okay. Dr.                  16 Barbara Boardman?                  17 <b>EXECUTIVE DIRECTOR CARTER:</b> For                  18 Dr. Weiss, then they can go back in.                  19 <b>CHAIRMAN WELLS:</b> Okay, I'm sorry.                  20 Dr. Board Members, I keep saying that.                  21 <b>DR. BOARDMAN:</b> Hello? Hi.                  22 <b>CHAIRMAN WELLS:</b> Hi.                  23 <b>DR. BOARDMAN:</b> This is Dr.                  24 Boardman. Can you hear me?                  25 <b>EXECUTIVE DIRECTOR CARTER:</b> Stop.</p>

78	<p>1 <b>CHAIRMAN WELLS:</b> Hold on just one</p> <p>2 second, Dr. Boardman.</p> <p>3 <b>EXECUTIVE DIRECTOR CARTER:</b> One</p> <p>4 second.</p> <p>5 <b>CHAIRMAN WELLS:</b> I'm dropping the</p> <p>6 ball here.</p> <p>7 <b>EXECUTIVE DIRECTOR CARTER:</b> No,</p> <p>8 you...</p> <p>9 <b>CHAIRMAN WELLS:</b> Are there any</p> <p>10 Committee questions for Dr. Weiss before we move</p> <p>11 on to the next speaker?</p> <p>12 <b>DR. WEISS:</b> I answered all the</p> <p>13 questions.</p> <p>14 <b>CHAIRMAN WELLS:</b> Okay.</p> <p>15 <b>DR. WEISS:</b> Thank everybody so</p> <p>16 much for taking the time to really give our</p> <p>17 profession this shot, I thank you from the bottom</p> <p>18 of my heart.</p> <p>19 <b>CHAIRMAN WELLS:</b> Okay, thank you.</p> <p>20 Okay, Dr. Boardman, I'm sorry.</p> <p>21 <b>DR. BOARDMAN:</b> That's fine.</p> <p>22 <b>CHAIRMAN WELLS:</b> You're on deck.</p> <p>23 <b>DR. BOARDMAN:</b> Okay, hi, I'm Dr.</p> <p>24 Barbara Boardman, I'm with the Virginia Chapter</p> <p>25 of the Academy of Pediatrics, I'm on their Board,</p>	80	<p>1 visits the children currently receive with their</p> <p>2 pediatrician, that these are critical and insure</p> <p>3 that families receive important preventative</p> <p>4 care, including vaccinations, developmental</p> <p>5 milestones training, screening for mental health</p> <p>6 issues, nutrition, sleep, behavior, and physical</p> <p>7 issues. We are concerned that children would</p> <p>8 instead be taken by their parents to naturopathic</p> <p>9 providers who are not trained to provide this</p> <p>10 care and potentially serious medical issues could</p> <p>11 be overlooked. We respectfully ask that as you</p> <p>12 conduct this study you consider how treatment of</p> <p>13 patients under age eighteen would be included</p> <p>14 with any recommendations. If you have any</p> <p>15 questions, I'm willing to answer them.</p> <p>16 <b>CHAIRMAN WELLS:</b> Anyone with any</p> <p>17 questions?</p> <p>18 <b>ATTENDEES:</b> (No audible response.)</p> <p>19 <b>CHAIRMAN WELLS:</b> Dr. Boardman, I</p> <p>20 do have one. I understand your regard for</p> <p>21 pediatrics specialization. Do family</p> <p>22 practitioners, nurse practitioners, and physician</p> <p>23 assistants receive that same, or do you have</p> <p>24 concerns about those folks treating under</p> <p>25 eighteen?</p>
79	<p>1 and we wanted to come in and say first of all we</p> <p>2 agree with the comments provided by the Medical</p> <p>3 Society of Virginia and join them in opposing</p> <p>4 licensure for naturopathic providers. The</p> <p>5 Virginia AEP has serious concerns about patient</p> <p>6 safety, specifically for patients under age</p> <p>7 eighteen. Treating children is much different</p> <p>8 than treating adults. As pediatricians, we are</p> <p>9 required to do our residency in pediatrics for at</p> <p>10 least three years after our four years of medical</p> <p>11 training. Pediatric specialists undergo</p> <p>12 additional one to two, three years of training</p> <p>13 beyond this. With that said, we believe that</p> <p>14 training naturopathic providers, that the</p> <p>15 training naturopathic providers receive is</p> <p>16 considerably less rigorous than the training for</p> <p>17 pediatricians in allopathic and osteopathic</p> <p>18 medicine. There is no standardized admission</p> <p>19 testing or postgraduate residency training in the</p> <p>20 field of children other than that that is</p> <p>21 optional. Our concern is that if the</p> <p>22 Commonwealth chooses to license this profession,</p> <p>23 parents will falsely believe that this type of</p> <p>24 care is sufficient for their child. We view it</p> <p>25 as very important to have annual visits, well</p>	81	<p>1 <b>DR. BOARDMAN:</b> We have worked on</p> <p>2 those issues separately. I actually do training</p> <p>3 for PA's for Eastern Virginia Medical School, and</p> <p>4 I think you need to be aware that the primary</p> <p>5 concern is making sure that people get in for the</p> <p>6 full pediatric well visit, and that they don't</p> <p>7 get confused about where they can get one. The</p> <p>8 family practice training is significantly closer</p> <p>9 to our training than the, that this would be.</p> <p>10 <b>CHAIRMAN WELLS:</b> Okay, thank you.</p> <p>11 All right, anyone else with any questions for Dr.</p> <p>12 Boardman?</p> <p>13 <b>ATTENDEES:</b> (No audible response.)</p> <p>14 <b>CHAIRMAN WELLS:</b> Okay, thank you,</p> <p>15 Dr. Boardman.</p> <p>16 <b>DR. BOARDMAN:</b> Okay.</p> <p>17 <b>CHAIRMAN WELLS:</b> All right, next</p> <p>18 is Cassidy Morris.</p> <p>19 <b>MS. MORRIS:</b> (No audible</p> <p>20 response.)</p> <p>21 <b>EXECUTIVE DIRECTOR CARTER:</b> There</p> <p>22 we go.</p> <p>23 <b>MS. MORRIS:</b> Are you able to hear</p> <p>24 me?</p> <p>25 <b>EXECUTIVE DIRECTOR CARTER:</b> Yes.</p>

82	<p>1 <b>CHAIRMAN WELLS:</b> Yes.</p> <p>2 <b>MS. MORRIS:</b> Okay, I apologize, I</p> <p>3 am not able to put my. Give me one moment.</p> <p>4 Thank you. This is Cassidy Morris, I'm a third</p> <p>5 year student at the National University of</p> <p>6 Natural Medicine, an accredited naturopath,</p> <p>7 natural medical school. As a Virginia native, I</p> <p>8 do request the Board recommend licensure for</p> <p>9 medically trained naturopathic doctors. As a</p> <p>10 naturopathic medical student, I studied, I</p> <p>11 studied my undergraduate, and at the age of</p> <p>12 thirteen began attending physical assistant</p> <p>13 school. I do believe I can speak to the limits</p> <p>14 of the four year graduate level curriculum ND's</p> <p>15 undertake. Prior to coming to medical school, I</p> <p>16 worked for a top doctor based out of Vienna,</p> <p>17 Virginia with a concierge practice that focused</p> <p>18 heavily on individualized medical treatments.</p> <p>19 While working for this internal</p> <p>20 medical doctor, I helped research and make</p> <p>21 recommendations for specific health ailments</p> <p>22 that, that were provided in detailed reports to</p> <p>23 patients. With the different modalities that</p> <p>24 ND's produce that align with evidence in case</p> <p>25 status, I believe the healthcare system and care</p>	84
83	<p>1 provided the patients would greatly increase for</p> <p>2 treating underlying conditions and allow patients</p> <p>3 to get individualized care if in the, if indeed</p> <p>4 we are licensed and provided a regulated scope of</p> <p>5 practice. In hopes of potentially moving back</p> <p>6 home after graduation, it would be a dream to be</p> <p>7 able to work as an equal healthcare partner in an</p> <p>8 integrative medical office that would allow</p> <p>9 multiple medical providers to serve the health</p> <p>10 needs and desires to each patient. In addition,</p> <p>11 with the years and hours spent on higher</p> <p>12 education and the amount of debt that is</p> <p>13 accumulating in medical school, I finally desired</p> <p>14 to be able to use the title and credentials of</p> <p>15 being a naturopathic doctor, act in my name, and</p> <p>16 have them be as meaningful in Virginia as they</p> <p>17 are in licensed states.</p> <p>18 Naturopathic doctors study both an</p> <p>19 intense curriculum and take two standardized</p> <p>20 exams to be eligible for a licensure. Using the</p> <p>21 title naturopathic doctor should relay to the</p> <p>22 public that the individual has undergone this</p> <p>23 rigorous training and education and patients</p> <p>24 have, should have the confidence that the person</p> <p>25 that they are choosing their care from is able to</p>	85

1 provide the specialized attention and care needed

2 with as little red tape as possible. Currently

3 there are eighty-two, of students at the various

4 naturopathic medical schools that have expressed

5 interest in practicing in the State of Virginia,

6 that I know not only myself requests the Board to

7 recommend licensure for medical training of ND's

8 and know that you will be hearing from other

9 medical students and graduates as well. Thank

10 you for your time and I hope you will be able to

11 recommend my friends and family to go see a

12 licensed naturopathic in the area soon. Thank

13 you so much.

14 **CHAIRMAN WELLS:** Thank you.

15 **EXECUTIVE DIRECTOR CARTER:** Thank

16 you. We also had some first.

17 **CHAIRMAN WELLS:** Okay. Community

18 Members, do we have any questions for Ms. Morris?

19 **ATTENDEES:** (No audible response.)

20 **CHAIRMAN WELLS:** Okay, Dr. Carter?

21 **EXECUTIVE DIRECTOR CARTER:** Ms.

22 Morris, would you consider only working in the

23 integrative medical setting so you would be in a

24 team setting, or are you expecting to practice

25 solo? So that's, you know, there's a little, in

1 terms of the public protection that could be

2 something you need to consider.

3 **DR. CASSADY MORRIS:** Yeah, most

4 definitely. I would be happy to do a private

5 practice, I though have spent the majority of my

6 background in conventional medicine, but I have

7 great relationships with, in these DO's that the

8 way that I see conventional medicine being

9 necessary in the world, I just think ND's would

10 be a great collab with that, but I, I would like

11 to work in integrative practice, but if I wanted

12 to work individualized, I would also wish to do

13 so as well, you know, in the State.

14 **EXECUTIVE DIRECTOR CARTER:** Thank

15 you.

16 **CHAIRMAN WELLS:** Thank you. All

17 right, Julie Coombs?

18 **MS. COOMBS:** Can you hear me okay?

19 Hi. Good morning, thank you. My name is Julie

20 Coombs and I'm here today representing the

21 American Naturopathic Medical Association, ANMA

22 represents the majority of naturopathic

23 practitioners in the United States.

24 Our membership includes

25 naturopaths, naturopathic doctors, traditional

<p style="text-align: right;">86</p> <p>1 naturopaths, as well as licensed MD's, DC's,                  2 DVF's and RN's that include naturopathic                  3 modalities in their practice. We agree with the                  4 Virginia Medical Society. ANMA does not support                  5 licensure for a few practitioners attempting to                  6 monopolize the profession.                  7         In study after study, naturopathy                  8 when practiced correctly, that means by the                  9 definition is bound not to be a threat to the                  10 public, in fact, licensing these graduates from                  11 Bastyr, National, Health West and Boucher                  12 Institute in Canada. By the way, none of these                  13 seen are recognized as real medical schools, even                  14 though they would lead you to believe so,                  15 allowing them to practice outside of the scope of                  16 the definition of naturopathy and practice                  17 medicine without going to medical school is                  18 essentially giving them a license to kill.                  19         They think if they put a natural                  20 substance, such as turmeric, in an IV that that                  21 makes it naturopathy, when in fact it does not,                  22 and a patient was killed in California by a                  23 licensed naturopathic doctor with a turmeric IV.                  24 None of the therapies that they have made up by                  25 mixing allopathic and naturopathic medicine are</p>	<p style="text-align: right;">88</p> <p>1 commonly called integrative medicine, by mixing                  2 allopathy and naturopathy together, and you                  3 should address them as such and avoid the                  4 confusion and protect the public. Thank you.                  5         <b>CHAIRMAN WELLS:</b> Thank you. All                  6 right. Do any of the Committee Members have any                  7 questions for Ms. Coombs?                  8         <b>MR. SALAY:</b> So I take it you have                  9 no members that are actually licensed in any                  10 state?                  11         <b>MS. COOMBS:</b> No, we don't seek                  12 licensing in any states. Several states that                  13 license these AANP naturopaths say that we don't                  14 have to be licensed because we don't, we're not a                  15 threat to the public, and they are allowed to                  16 practice with the terms naturopath, traditional                  17 naturopath, naturopathic practitioner. In Idaho                  18 we're allowed to call ourselves naturopathic                  19 doctors without a license required because we                  20 don't present a threat to the public.                  21         <b>CHAIRMAN WELLS:</b> Anyone else?                  22 Okay. Would any Committee Member like to                  23 redirect a question to any of the speakers? Mr.                  24 Salay, did you want to ask Dr. Seitz regarding                  25 the accreditation or the curriculum?</p>
<p style="text-align: right;">87</p> <p>1 tested or approved by the FDA, or anyone, not                  2 even by them.                  3         They will present to you a list of                  4 states that license them and they never talk                  5 about the fact that there is no naturopathic                  6 standard of practice or title between these                  7 states and these states allow them to do nothing                  8 more than practice naturopathy by the definition.                  9 We come to you saying that you must protect the                  10 public when really licensure is the problem.                  11 Clients think they are going to someone who                  12 practices real naturopathy and they get                  13 experimental treatment from other countries or                  14 concocted by the practitioner, or prescription                  15 drugs. This is very confusing to the public.                  16         We all know that there are plenty                  17 of laws to protect the public, and just like                  18 having DOE-approved E-2 credit says nothing about                  19 the quality of the education you provide. A                  20 state license does nothing about the quality of                  21 the practitioner, and it takes a very special                  22 person to practice real naturopathy, and the                  23 citizens of Virginia deserve access and                  24 knowledge. Furthermore the ANMA would suggest to                  25 you that these practitioners practice what is</p>	<p style="text-align: right;">89</p> <p>1         <b>MR. SALAY:</b> Yes, he's still on?                  2         <b>DR. SEITZ:</b> Yes, I'm still here.                  3 And let me just say that there was an assertion,                  4 I'm paraphrasing, that somehow there's no                  5 oversight of the actual education of naturopathic                  6 doctors, and I just want to offer some                  7 observations about that.                  8         So first of all, all of our                  9 programs in the United States are in                  10 institutionally accredited colleges and                  11 universities, institutional accreditors certainly                  12 are concerned that the academic programs can be                  13 demonstrated to be rigorous and at the                  14 educational level that the degree is offered.                  15 There are states, boards of higher education that                  16 have to approve the degree programs.                  17         Also, the naturopathic programs                  18 are not solely taught by naturopathic doctors.                  19 Every school that offers the program has PhD's                  20 and bio, in the biosciences, also MD's who teach                  21 as part, clinical courses, so these are programs                  22 where you have an interdisciplinary group of                  23 people all with terminal degrees in various                  24 natural medical fields. And they certainly                  25 contribute to not only quality teaching but they</p>

90	<p>1 also contribute to an understanding of what needs                  2 to be offered in doctoral level education.                  3 I'm not sure if people are aware                  4 of this, but the University of California, and I                  5 believe the branch is in Irvine, actually has an                  6 integrated medicine clinic that's part of its                  7 medical school, and it has naturopathic doctors                  8 who provide clinical services, in fact that's a                  9 residency site for naturopathic doctors. And                  10 that's another indication that people who get to                  11 know naturopathic doctors and work closely with                  12 them understand that they really operate at a                  13 fine level of medical integrity. It is true that                  14 in accreditation most fields are largely peer                  15 reviewed and peer developed, as for chiropractic                  16 and acupuncture, true of naturopathic medicine,                  17 but we are part of this larger ecosystem and                  18 involved and guided by that as well.                  19 <b>MR. SALAY:</b> Thank you.                  20 <b>CHAIRMAN WELLS:</b> Okay. Do the                  21 Committee Members have any further questions?                  22 <b>COMMITTEE MEMBERS:</b> (No audible                  23 response.)                  24 <b>CHAIRMAN WELLS:</b> Okay, if not we                  25 have heard comment from all persons who contacted</p>	92	<p>1 University, and at the University of Virginia.                  2 My, my oncologist at the University of Virginia                  3 actually worked for me to see a naturopathic                  4 doctor because I am suffering with some                  5 complications to long-term radiological                  6 surveillance and, and there, you know, the                  7 traditional system, which I credit for giving me                  8 these many extra years of my life, and I'm                  9 extremely grateful to them for that, but also,                  10 you know, at the time, unknowingly, you know,                  11 caused me additional harm in the imaging process                  12 because they didn't have that information at the                  13 time that it would be potentially damaging to me.                  14 So there's nothing that those teams of doctors                  15 can offer me to be helpful and so they                  16 recommended that I see a naturopathic doctor and                  17 it has been really helpful in supporting me and                  18 my body in trying to just deal with the effects                  19 of that and manage them without doing any harm,                  20 additional harm to me, which people, they see                  21 chelation therapy, which can be very dangerous if                  22 it's not managed properly, and I am very grateful                  23 to know enough about natural, naturopathy                  24 training to find someone who I know has an                  25 extensive understanding of just physiology and</p>
91	<p>1 the Board of Health Professions office in advance                  2 regarding the naturopathic doctor review, so this                  3 concludes today's oral public comment.                  4 <b>MS. GARNETT:</b> Excuse me? Hello?                  5 <b>EXECUTIVE DIRECTOR CARTER:</b> Who is                  6 that?                  7 <b>MS. JACKSON:</b> Please identify                  8 yourself.                  9 <b>MS. GARNETT:</b> Yes, hi, this is                  10 April Garnett, I contacted you in advance, I've                  11 been here since 9:00 this morning. I have not                  12 been called to testify.                  13 <b>MS. JACKSON:</b> Okay.                  14 <b>CHAIRMAN WELLS:</b> Okay. We all                  15 make mistakes, so could you spell your, okay.                  16 <b>EXECUTIVE DIRECTOR CARTER:</b> It's                  17 up there. It's up there.                  18 <b>MS. GARNETT:</b> April Garnett.                  19 <b>CHAIRMAN WELLS:</b> Okay.                  20 <b>MS. GARNETT:</b> G-A-R-N-E-T-T.                  21 <b>CHAIRMAN WELLS:</b> Okay. All right,                  22 go ahead Ms. Garnett, or Dr. Garnett.                  23 <b>MS. GARNETT:</b> Okay. I'm here to                  24 give a patient perspective. I am a cancer                  25 survivor, I've been seen at Johns Hopkins</p>	93	<p>1 biochemistry, and I know that they can support me                  2 through this process without risking, doing                  3 additional harm with these processes. And that,                  4 you know, it's not, this isn't, I'm not going to                  5 just walk into a health food store and ask the                  6 person working there to help me out. So that's                  7 my testimony if anyone has any questions for me.                  8 <b>CHAIRMAN WELLS:</b> Do any of the                  9 Committee Members have any questions?                  10 <b>COMMITTEE MEMBERS:</b> (No audible                  11 response.)                  12 <b>CHAIRMAN WELLS:</b> And we apologize                  13 that we didn't get your name on the list, we                  14 would have gotten to you sooner or in the                  15 rotation.                  16 <b>MS. GARNETT:</b> It's okay.                  17 <b>EXECUTIVE DIRECTOR CARTER:</b> Yes,                  18 and Ms. Garnett we have you down as...                  19 <b>MS. GARNETT:</b> I just wanted to                  20 make sure that you didn't end it without, without                  21 me...                  22 <b>EXECUTIVE DIRECTOR CARTER:</b> No.                  23 We have you on the list for written comments, as                  24 we had gotten an email from you and we had this                  25 written comment, so I will take the blame for not</p>



<p style="text-align: right;">94</p> <p>1 making sure that you were on this other one.                  2 <b>MS. GARNETT:</b> Okay.                  3 <b>EXECUTIVE DIRECTOR CARTER:</b> Thank                  4 you.                  5 <b>MS. GARNETT:</b> Thank you.                  6 <b>CHAIRMAN WELLS:</b> Thank you. Okay.                  7 Folks, in closing, I do want to give you a                  8 reminder, written comment on both studies will                  9 continue to be received until 5:00 p.m. on August                  10 17th of 2020. I want to thank everyone who                  11 participated, both the speakers, and Ms. Jackson,                  12 Dr. Carter, Ms. Lane, everybody, Matt, who kept                  13 things going. We certainly appreciate it and we                  14 are now adjourned.                  15 <b>EXECUTIVE DIRECTOR CARTER:</b> Thank                  16 you.                  17 <b>(WHEREUPON, the virtual meeting and public                  18 hearing of the Board of Health Professions                  19 Regulatory Research Committee was adjourned at                  20 1:03 p.m.)</b>                  21                  22                  23                  24                  25</p>	<p style="text-align: right;">96</p> <p>1 CERTIFICATE OF REPORTER AND SECURE                  ENCRYPTED                  2 SIGNATURE AND DELIVERY OF CERTIFIED TRANSCRIPT                  3 I, <b>CHERYL R. LANE</b>, Notary Public, do hereby                  4 certify that the forgoing matter was reported by                  5 stenographic and/or mechanical means, that same was                  6 reduced to written form, that the transcript prepared                  7 by me or under my direction, is a true and accurate                  8 record of same to the best of my knowledge and                  9 ability; that there is no relation nor employment by                  10 any attorney or counsel employed by the parties                  11 hereto, nor financial or otherwise interest in the                  12 action filed or its outcome.                  13 This transcript and certificate have been                  14 digitally signed and securely delivered through our                  15 encryption server.                  16 IN WITNESS HEREOF, I have here unto set my hand                  17 this 13TH day of AUGUST, 2020.                  18                  19                  20                  21                  22 /s/ CHERYL R. LANE                  23 COURT REPORTER / NOTARY                  24 NOTARY REGISTRATION NUMBER: 7864242                  25 MY COMMISSION EXPIRES: 05/31/2024</p>
<p style="text-align: right;">95</p> <p>1 CAPTION                  2                  3 The foregoing matter was taken on the date, and at                  4 the time and place set out on the title page hereof.                  5                  6 It was requested that the matter be taken by the                  7 reporter and that the same be reduced to typewritten                  8 form.                  9                  10                  11                  12                  13                  14                  15                  16                  17                  18                  19                  20                  21                  22                  23                  24                  25</p>	

August 1, 2020

Dear Members of the Committee,

Thank you so much for addressing the potential need for licensing naturopathic physicians in Virginia. My name is Desta Golden and I have been a naturopathic doctor for over 5 years. I am writing in support of full licensing medically-trained naturopathic doctors. I was born and raised in the Shenandoah Valley. When I left for naturopathic medical school many friends and family were excited for me and eager to have me return and offer my knowledge and services to the community. Since returning, I frequently receive queries from community members requesting services I am trained in, but I cannot provide in Virginia. Services that I could provide were in Vermont where I currently hold a license. This is incredibly frustrating as a practitioner and for the community who is seeking help.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** As with any health profession, it is important for the consumer to understand the background and education of any provider they are seeing. Without licensure, it is difficult to differentiate the level of education and expertise a natural medicine provider offers. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. In return, naturopathic doctors should be held accountable to a higher professional standard by a regulatory board.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers who complete a rigorous education in unique and highly specialized skills. After completing an federally accredited, residential medical program, naturopathic doctors complete board exams in basic and clinical sciences. The COVID-19 pandemic, in combination with the crisis of chronic disease and opioid abuse, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine and are the only practitioners formally trained in these interactions.
- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams. Naturopathic doctors are well-versed in appropriate referral practices and providing patient-centered care within a team.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. On many occasions I have volunteered with the Remote Area Medicine organization which offers medical services to underserved

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communities. With so many Virginians lacking access to a primary care provider Virginia needs to expand access to trained primary care providers including naturopathic doctors when possible.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,  
Desta Golden ND, MS

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On Mon, Aug 3, 2020 at 5:04 PM Pam Oken-Wright <pokenwright@gmail.com> wrote:  
August 3, 2020

Dear Members of the Committee,

My name is Pamela Oken-Wright, I have been a Virginia resident for over 40 years and I have been under the care of a naturopathic doctor for over one year. I am writing in support of full licensure for medically-trained naturopathic doctors. I have suffered with debilitating symptoms for 30 years, and none of the conventional physicians I saw was able to help. In fact, some of the attempts at treatment have left me in worse condition.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**Specialized skills.** Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. For me, that means treatment for chronic Lyme, for which natural medicine has more management possibilities than other doctors I've seen.

**Autonomous practice.** Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and knowledge in both conventional and natural medicine. Years of being treated with NSAIDS injured my kidneys, I won't take opioids, and conventional medicine has no other/better answers for me. My naturopathic doctor does.

**Scope of practice.** Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. From the patient perspective this creates an added burden - as patients need to then schedule an additional appointment with their primary care provider in order to access labs and basic medications. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services -- including prescriptions, such as basic antibiotics and anti-hypertensives. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.

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**Economic impact.** (Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. Many of us who must see NDs are going broke trying to pay for our care entirely out of pocket. In this era of chronic disease, where its burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,  
Pamela Oken-Wright

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On Mon, Aug 3, 2020 at 6:36 PM Linda Davis <miss.lcdavis@gmail.com> wrote:

Dear Committee Members-

My name is Linda Davis and I have been a VA resident all my life. I am almost 65. I have been under the care of a naturopathic doctor (NP) for over a year. So, I am writing in support of full licensure for medically-trained naturopathic doctors. My experience has been extremely beneficial. I really do not want to use conventional meds and methods which have so many side effects. Finding a medically trained naturopath was a godsend for me. Some of the homeopathic remedies and supplements have helped conditions I had.

Here are some things to note:

- 1) **Specialized Skills**-NPs are the only medical providers specifically trained in drug-herb and drug nutrient interactions. They are extensively trained in both conventional methods and natural medicine which bridges the gap between conventional and traditional medicine practice.
- 2) **Scope of Practice**-Currently NPs can't offer physical exams or order labs or imaging. They can't even order labs or imaging. Also they can't test for COVID or run a complete blood count. Therefore, patients have to get them on their own or schedule additional appointments with their primary care doc. Medically-trained NPs would be well equipped to provide these practices. Currently they can order labs in 25 jurisdictions where they are regulated and prescribe meds in 13 states. Also they are recognized as primary care providers in 12 states and credentialed by health insurance companies in 6 states.

Licensing medically-trained NPs will provide additional safe healthcare access for patients most in need. **I respectfully urge the Board to recommend full licensure for naturopathic doctors in VA.**

Sincerely,  
Linda Davis

"For to me, to live is Christ, and to die is gain." Philippians 1:21

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and naturopathic doctors over the years. Naturopathic doctors are well trained to look at "the whole patient", rather than the reductionistic approach that is crippling healthcare today. They functioned in a superior manner to mainstream trained providers in obtaining a history and identifying the "root cause of the symptoms". They were able to empower the patient to make necessary lifestyle changes rather than treating the symptoms alone or adding another drug to the mix.

Many patients were cured by merely reducing the expensive and dangerous poly-pharmacy that we see so frequently today. In addition, the focus of dietary causes and natural supplements allows the patient to be involved in their healthcare and has less side effects than the plethora of prescriptions used so routinely.

I rarely saw a patient that was not grateful for the opportunity to work with a naturopathic doctor. Since retiring, many desperate patients have reached out to me, saying that there is no place to turn.

**Risk for Harm.** Licensing of naturopathic doctors will provide safe access to the care they provide. The onus of sorting out who is a medically-trained naturopathic doctor from someone who took online correspondence training should not fall to the patients. Licensing will help draw more medically-trained naturopathic doctors to Virginia, increasing patient access to care. While I have never seen one patient harmed by the experience, all medically-trained professionals pose some degree of risk of harm. Regulation helps to ensure the safety of patients while holding medical professionals accountable. I recently read that 75% of oncology patients seek alternative medicine and most patients do not tell their oncologist. Licensing would help lessen this issue.

**Economic Impact.** Licensing create a framework for medically-trained naturopathic doctors to be able to participate in the greater health care system. While I understood the value for naturopathic doctors, they functioned under the scope of their acupuncture license. Larger medical systems are unable to credential unlicensed providers. Without access to insurance coverage many patients are unable to access the preventative medical care that naturopathic doctors are so well suited to provide. Lack of licensing reduces the number of medically-trained naturopathic doctors in Virginia and increases costs to patients.

**Specialized skill and training.** Medically-trained naturopathic doctors training is unique. While elements, such as basic sciences are similar between various medical program, their approach to care is fundamentally different from other medical providers and from lay naturopaths who are not medically trained. As you are aware, naturopathic doctors complete a 4-year, in residence, medical program and complete board exams in basic sciences. They also take licensing exams in pharmacology, minor surgery, nutrition, botanical therapies and physical medicine. They are credentialed by the CNME (Council on Naturopathic Medical Education) which is recognized by the US Department of Education. Naturopathic doctors also have residency training opportunities. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition and botanical medicine.

**Scope of Practice.** In this critical time of provider shortages, Virginians need increased access to the full range of cost effective primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors work collaboratively with other providers and can serve an important role in the provider shortage in Virginia.

Please feel free to contact me with any questions that you may have.

I urge you to support the full licensing of naturopathic doctors in Virginia.

Regards,

Grace L Keenan, MD

7

On Sun, Aug 2, 2020 at 12:37 PM Grace Keenan <grace.keenan1000@gmail.com> wrote:

Please read the attached document in support of licensing Naturopathic Doctors.  
Regards,

Grace L. Keenan, MD

August 3, 2020

Grace L Keenan, MD  
40310 Hurley Lane  
Paeonian Springs, VA 20129

Dear Members of the Committee,

I am writing this letter in support of the full licensing of naturopathic doctors in Virginia.

I would like to share a few relevant points regarding my career and experience with naturopathic doctors. In 1998, I moved to Northern Virginia and opened a practice in Sterling, VA. I was a newly graduated, Board Certified Internal Medicine Physician. I began a solo practice and it was not long until I realized the challenge of managing patients with chronic conditions. I shared the patient's disappointment with the results obtained from standard of care treatments for many chronic conditions, particularly fibromyalgia, chronic fatigue syndrome, migraine and obesity, to name a few. In 1995 I underwent a 5 year saga of reproductive endocrinology treatment in an effort to conceive. Complications from these procedures led to me being confined to bed for over a year. During this time of stress and tremendous boredom, I read many books and took an extension course from Harvard in Complimentary Medicine, now called Integrative Medicine.

I learned the history of medicine, the birth and subsequent role of the American Medical Association, the fact that more patients were treated for cholera in America with homeopathy than Western medicine and the systemic rejection of herbal and natural therapies with the discovery of antibiotics, insulin, advancements in anesthesia, etc. I learned about the Flexner Report and the resultant redirection of delivery of healthcare in America and change in Hahnemann University Hospital from a Homeopathic to Western Medicine Hospital.

When I returned to the practice of medicine in 2000, the success of modern medicine and the birth of a healthy daughter, I embarked upon working with integrative providers. By this point my practice had expanded from a solo practice to a patient-centered, multi-disciplinary, primary care medical home with four different locations in Northern Virginia. My clinic was the largest integrative, primary care, medical home in Virginia, until being acquired by Inova in 2016.

For 18 years, I worked with naturopathic doctors who were also licensed in acupuncture I hope that my lifetime career allows me to speak to the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

**Autonomous practice.** The naturopathic doctors worked autonomously in this model, yet in collaboration with the patient's healthcare team. In all 25 jurisdictions that regulate, naturopathic doctors practice patient care independently. Over these years, we helped thousands of patients in a team-like manner, merging the best of Eastern and Western medicine with the patient truly at the "Center of Care". Many patients would come to see me as a last resort. Having failed to gain relief after seeing multiple specialists, physicians would advise them to see Grace Keenan and her team. We were referred patients deemed "unresponsive to mainstream approaches" and although we cannot claim curing everyone, it was a rare patient that we did not help. I have learned so much from my patients

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August 5<sup>th</sup>, 2020

Dear Members of the Committee,

Thank you very much for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Dr. Teerawong Kasilorn, and I have been a naturopathic doctor for over 15 years. I am writing in support of full licensing medically-trained naturopathic doctors. I have been practicing in Virginia since 2006 after finishing up my medical residency in Connecticut. I had been working at Nova Medical Group and now Inova Medical Group for over 13 years. Without Naturopathic licensure in Virginia, it is very difficult for me to order diagnostic lab tests for my patients even though I had been properly trained to order comprehensive diagnostic laboratory tests. Patients have to make additional medical visits to get lab orders from their doctors with extra costs and increase burden on the medical care visits especially with COVID-19 pandemic. Also, without proper Naturopathic licensure in Virginia, patients and medical doctors are confused about online Naturopathic degrees and medically-trained Naturopathic doctors.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while almost promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of "naturopathic doctors", which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to

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specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic

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doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Teerawong Kasiolam (Kan), N.D., L.Ac., MSAc., Dipl. Ac. (NCCAOM)®  
Naturopathic Doctor | Licensed Acupuncturist (VA License#: 0121000439)  
Tel: (571) 207-6768 | Email: contact@drkancenter.com

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Shelly Dotson  
Sterling, VA 20164  
shellydotson483@gmail.com

August 3, 2020

Dear Committee Leaders,

I have been a resident of Virginia since 1994 and have been under the care of Naturopathic Doctor since 2018. I am writing to you to support full licensure for all medically-trained naturopathic doctors. As examples, I have learned a lot about genetic testing, as well as found out that I had a couple autoimmune disorders that went undiagnosed with conventional doctors. This has benefited me greatly and I have been able to learn how to treat the CORE of those issues, not just cover up the issues/symptoms. I have a huge compassion for these doctors and the long hours of medical training they've endured to practice naturopathy. As someone who has spent four decades in the conventional medicine system with a serious congenital disorder, having these doctors to fall back on helps me to understand why and how some of these illnesses occur and whether they are related to my congenital disorder or if they are hereditary.

I am a patient who supports licensure for medically-trained naturopathic doctors; therefore, here are a few concerns I have as it relates to the seven criteria:

- 1) Risk of Harm: Due to my congenital issue, I have to be very careful the conventional medication that I am prescribed which could very easily kill me if I take for long-term. I could get to a point where I could lose all bodily function due to some medications. I have already had many negative issues with medications and vaccines. Some which were needed to live/work overseas.
- 2) Specialized skills: I trust the naturopathic doctors because they have gone through many years of medical training and understand how to correlate conventional medicine with naturopathic (holistic) approaches to help the patient FEEL better and heal from the chronic illness. They are the only medical professionals who understand the drug-herb and/or drug-nutrient interactions and can suggest the best treatments, NOT just cover up symptoms of chronic disease.
- 3) Economic impact: Licensing medically-trained naturopathic doctors would reduce the impact of our existing system by creating additional access for patients. Licensing would also pave the road for insurance coverage which would give greater access for all citizens of Virginia.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for patients most in need. I, respectfully, urge the board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Shelly R. Dotson

From: April Garnett <orders4april@gmail.com>  
Date: Wed, Aug 5, 2020 at 11:16 AM  
Subject: Licensing of Naturopathic Doctors in VA  
To: <elizabeth.carter@dhp.virginia.gov>

August 3, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is April Sharp Garnett, and I have been a student of natural healing remedies for nearly thirty years. I not, however, a naturopathic doctor, nor should I be able to refer to myself as one. I am writing in support of full licensing medically-trained naturopathic doctors. About twenty years ago, I seriously considered pursuing an ND degree, but I decided not to do so because of the lack of licensing in my home state of Virginia. I believe my perspective as both a patient of ND, Dr. Leah Hollon, and my knowledge of the stringent pre-requisites and curriculum to become an ND uniquely qualifies me to opine on this matter.

With every medical profession, it is important to have oversight to ensure accountability and public safety. The process for renewing my Massage Therapy license in Virginia is difficult, but I could call myself a doctor of naturopathic medicine without any basic science knowledge, including basic human anatomy and physiology. This discrepancy in policies baffles and troubles me. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity -- while almost promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in

basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME

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accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,  
April S. Garnett

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From: Chen, Liana <Liana.Chen@inova.org>  
Date: Wed, Aug 5, 2020 at 3:55 PM  
Subject: In Support of Naturopathic Doctors  
To: elizabeth.carter@dhp.virginia.gov <elizabeth.carter@dhp.virginia.gov>

Dear Members of the Committee,

I am personally writing in support of the licensing of naturopathic doctors. My name is Liana Chen and I am actively practicing family medicine as a nurse practitioner for the past 5 years. My practice and I have been working collaboratively with medically trained naturopathic doctors throughout this time.

The value we place on our referrals to naturopathic doctors is due to their primary focus on the underlying causes of the illness, not just the symptoms, which aides my patients in a faster recovery from numerous disease and ailments. Their emphasis on prevention using a non-pharmaceutical approach has the ability to better connect with patients who are otherwise non-compliant with Western medicine techniques. However, I urge you to understand that I emphasize my use and full support of naturopathic doctors, not naturopaths, who have received doctoral degrees from federally recognized accredited programs and who are well versed in pharmacology, nutrition, botanical therapies and physical medicine

With the pandemic, there is an increased need to combat this new disease and an even greater need to strengthen the immune system using adequately trained professionals. Licensing medically trained naturopathic doctors will provide a way to have not just greater access to healthcare but safe healthcare for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Liana Chen FNP  
51 Catocin Cir NE  
Leesburg, VA 20176  
NPI: 1083084776

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Julie A. Jacobs  
17150 Dunns Chapel Rd.  
Montpelier, VA 23192  
503-680-4684

August 5, 2020

Esteemed Delegate/Representative or to Whom it May Concern,

I am writing to support current Legislative action that allows the licensing and registration of Naturopaths in the Commonwealth of Virginia. I moved to Virginia two years ago from Oregon. Everything about my transition to this beautiful state has been truly wonderful. I am proud to now call Virginia, home.

Coming from a state that has licensed Naturopathic doctors for many, many years, I was completely shocked and surprised that I was unable to use my traditional health insurance for this most important, health conscious medical choice. To further learn that Naturopath's are not licensed in this state was a very unwelcome surprise. I have chosen Naturopathy for my primary healthcare for over ten years. In those ten years I have had life changing physical health challenges that were successfully resolved using naturopathic intervention. Without surgery, without expensive pharmacology, without expensive specialty visits. This alternative means of healthcare is more successful and far less expensive than traditional healthcare. Health insurance companies cover naturopathy as a covered benefit in Oregon.

I fully believe and have personally experienced that the specialized skill set of Naturopathic Doctors leads to better health outcomes primarily because this approach utilizes functional medicine -- treating the body as a whole, living, inter-related system vs. the traditional medical approach of individual body system specialty which is frankly, counter-productive and creates more side-effect and illness than a more integrated approach.

I strongly urge you to support Legislation that ratified and licenses Naturopathic Doctors who have achieved verified credentials through an approved school of Naturopathy. The education is rigorous. Those who choose to practice in this way are holistic, comprehensive and professional in their delivery of healthcare that in my experience, far surpasses what traditional medicine can and does offer.

Thank you for your support. In these challenging times it is even more important to support alternative healthcare that treats the whole person -- body, mind and spirit.

Respectfully,  
Julie Jacobs

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August 5, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is David Zeoli, and I have been a naturopathic doctor for over 20 years. I am writing in support of full licensing medically-trained naturopathic doctors.

Though I am licensed as a naturopathic doctor in both Washington and Connecticut, I am currently practicing in Virginia. I have been here for over 5 years, and it has been a challenge for me to practice as a naturopathic doctor in an unlicensed state. Because there is no license for me, I am unable to practice medicine at the level at which I was trained. I was trained as a primary care physician, and yet Virginia does not recognize me as such.

Also, my patients are unable to utilize their health insurance benefits when they visit me and have to pay for my services out of pocket. Many people who wish to become my patients cannot afford to see me because their insurance does not cover my services in Virginia.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while almost promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.

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- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

David Zeoli, ND

4000 City Walk Way, Apt. 31

Charlottesville, VA 22902

434-244-2992

[dzeoli@yahoo.com](mailto:dzeoli@yahoo.com)

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2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.

4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.

5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.

6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.

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August 5, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Dr. Robert Boyd and I have been a naturopathic doctor for 3 years. I am writing in support of full licensing medically-trained naturopathic doctors.

After completing medical school and residency in Connecticut in 2018, I decided to move to Alexandria, Virginia to open my own business. Coming from Connecticut, where naturopathic doctors are fully licensed, this was quite the shift. In Connecticut, we have a full scope of practice and are licensed to perform physical exams, order labs, diagnose and treat disease. This is also the case in Washington D.C. and Maryland. I still decided to open my business here because I have always loved this area and it is important to me to serve the community that I live in. I knew going into opening my business that that being a medically-trained naturopathic doctor in an unlicensed state came with its drawbacks, but I firmly believe that this is a state and region that benefits from our knowledge and services.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath. I have had several clients who thought they were working with a medically-trained naturopathic doctor here in Virginia, only to realize that the individual they were working with had very little training and was unfit to help them with their health concerns. Categorizing medically-trained naturopathic doctors with lay-naturopaths poses a risk to public safety because the public has no way to differentiate an actual medical professional from someone with very little training. It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. We attend a 4-year, full-time, onsite medical program and complete board examinations upon graduation. We are experts in the field of nutrition, herbal medicine, nutritional supplementation and undergo extensive training in how these types of therapies can interact with pharmacotherapy.
- 3) **Scope of practice.** During medical school and residency, we are trained as primary care providers and our scope should reflect such training. I commonly collaborate with medical doctors and other health professionals in care for my clients. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental

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health illness. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.

- 4) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,  
Dr. Robert Boyd

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Linda M. Schuessler  
1659 Hunting Creek Drive  
Alexandria, VA 22314

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From: Linda s <linda.m.schuessler@gmail.com>  
Date: Wed, Aug 5, 2020 at 8:33 PM  
Subject: Support for HB 1040/SB 858

August 6, 2020  
SUBJECT: Support for HB 1040/SB 858

Dear Members of the Committee,

My name is Linda Schuessler I have been a Virginia resident for over 20 years, and I have been under the care of a naturopathic doctor off and on for the past several years. I am writing in support of full licensure for medically trained naturopathic doctors.

Shortly after I moved to Virginia I was diagnosed with an immune compromised disease. I have chosen to be proactive with my health and have completed research, etc. to assist me in this endeavor. I have worked with integrative MDs, traditional MD physicians that "allow" me to take a more holistic approach to health and medically trained naturopath physicians. I believe all are necessary for me to maintain my good health. Each has much to offer. I have worked with two medically trained naturopathic doctors recently. I have been able to continue my good health with them by exploring different avenues than with the traditional MD. Specifically, I have been able to acquire certain blood work that my oncologist and internist said either they have never heard of, or had heard of, but would not recommend. Once I shared the results with them, they understood why I was asking for the tests. Without the medically trained naturopathic doctors I never would have been able to secure the tests and make changes. I also work with an herbalist. The medically trained naturopaths understand what the herbalist is recommending for me, and they work in concert with each other.

As a patient who supports licensure for medically trained naturopathic doctors, below are additional comments.

If providers were licensed, people such as me would be better able to choose a provider that we could trust. I would know the provider was well educated and had passed the necessary course work and/or tests to acquire a license in the State of Virginia. I would know the individual is held to a high level of professionalism and accountability. While I discuss and share the information I received from my naturopaths with my traditional MD physicians, it is not necessarily received as well as it could be if these individuals were licensed.

Lastly, licensing medically trained naturopathic doctors would set the foundation for medical insurance coverage. While I am managing my chronic condition, there are times I cannot see the medically trained naturopathic doctor due to the expense. My traditional MD physician has "run out of options" to explore with me but the medically trained naturopathic doctors have not. They are great helping me with preventive actions. The traditional MD physicians only want to see the symptoms and then begin treatment. To me, this is backwards. I would rather stay healthy and not need a traditional MD physician.

Licensing medically trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Cordially,

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August 6, 2020

Dear Members of the Committee,

My name is Tara Ellen. I have been a Virginia resident for more than 14 years and I have been under the care of a naturopathic doctor for 8 years. I am writing in support of full licensure for medically-trained naturopathic doctors. I wanted to write this letter to the Board of Health Professions because I feel very strongly about supporting this cause. I hope you can take some time to read my thoughts and concerns.

For most of my adult life I have lived with chronic physical pain, digestive-related distress, anxiety and depression. I have sought help through traditional western medical approaches, all of which have failed me. I have seen countless general medical doctors, specialists and mental health professionals, all of whom have attempted to only treat symptoms. I have also tried various forms of medication, but prescription drugs and OTC medications have either been completely ineffective or created dangerous side effects. It was only until I sought the guidance and expertise of a medically-trained naturopathic doctor that I began to experience positive change. Currently, many of my medical issues have been resolved and I have maintained a supportive self care program that continues to enhance my well being. I firmly believe I would not have found such improvement in my overall health without a medically-trained naturopathic doctor.

One of my main concerns is legitimacy of those who practice naturopathic medicine. During my search for a practitioner, I came across several traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. It goes without saying that it is imperative that people have access to medically-trained naturopathic doctors. I need to be able to place my full trust in all medical professions, regardless of speciality, and there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia.

Being under the care of a naturopathic medical professional for many years, I have come to learn that medically-trained naturopathic doctors are not able to conduct physical exams, do complete bloodwork, or order testing and imaging (including COVID-19 tests). I never understood how a medical professional could be rendered so limited. Due to this, I would still need to make appointments with my PCP to obtain orders for routine labs and imaging. This has caused me to spend extra time and money receiving the care and testing required to address my health concerns. If my naturopathic doctor was able to complete these routine orders I would not have to struggle every time I need bloodwork or scans done.

I'd like to also share that I am self-employed and obtain my healthcare through the Marketplace. Each year during the enrollment period, my options for healthcare change based on what plans are offered in the state. Generally this requires me to seek out a new PCP because my previous PCP would not accept my new plan. This has become an added burden for me, as many healthcare practices are not accepting new patients.

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However, my naturopathic doctor is the only consistent medical professional who knows my history and has been available for me when I need care.

Seeing my naturopathic doctor is very costly for me. Insurance will not cover these visits. I've asked my naturopathic doctor about the use of medical codes on my bill in hopes that insurance may be able to reimburse me for a portion of the expense. I was informed that naturopathic doctors are not permitted to use these medical codes on my bill. I don't understand the reasons behind this. If I am discussing my health concerns and receiving advice from a medically-trained naturopathic doctor, why wouldn't standard medical codes be included in my records? This would greatly aid in potential reimbursement via my healthcare plan. I pay a great deal of money out of pocket for my health insurance, and it's important that I receive the benefits of coverage, especially when the naturopathic professional is integral to my well-being.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,



Tara Ellen

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Dear Members of the Committee,

I am personally writing in support of the licensing of naturopathic doctors. My name is Liana Chen and I am actively practicing family medicine as a nurse practitioner for the past 5 years. My practice and I have been working collaboratively with medically trained naturopathic doctors throughout this time.

The value we place on our referrals to naturopathic doctors is due to their primary focus on the underlying causes of the illness, not just the symptoms, which aids my patients in a faster recovery from numerous disease and ailments. Their emphasis on prevention using a non-pharmaceutical approach has the ability to better connect with patients who are otherwise non-compliant with Western medicine techniques. However, I urge you to understand that I emphasize my use and full support of naturopathic doctors, not naturopaths, who have received doctoral degrees from federally recognized accredited programs and who are well versed in pharmacology, nutrition, botanical therapies and physical medicine

With the pandemic, there is an increased need to combat this new disease and an even greater need to strengthen the immune system using adequately trained professionals. Licensing medically trained naturopathic doctors will provide a way to have not just greater access to healthcare but safe healthcare for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Liana Chen FNP  
51 Catocin Cir NE  
Leesburg, VA 20176  
NPI: 1083084776

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On Thu, Aug 6, 2020 at 8:47 AM Angel Thomas <[drangel\\_whptf@gmail.com](mailto:drangel_whptf@gmail.com)> wrote:

Dear Members of the Committee,

My name is Dr. Angel Thomas and I am writing to you in support of licensure for naturopathic doctors in Virginia. I am a women's health physical therapist and board certified orthopedic specialist who serves as a therapist at Women's Health Physical Therapy and Men's Pelvic Health in Richmond, VA. Currently, I share approximately 10% of my patients with qualified naturopathic doctors (NDs) who have been trained at accredited schools and attended medical residencies. I also refer many of my complex patients to these naturopathic doctors for personal attention that they sometimes do not get with traditional medicine. I trust the NDs that I work with they are very knowledgeable with diagnosis, plan of care, and research-based treatment.

As a medical professional who works under specific guidelines for state licensing and scope of practice, I believe these regulations and guidelines are important for any aspect of medical care to reduce risk of harm to potential patients. The general public does not know the difference between someone who has appropriate education and training and someone who uses the same marketing but it is not supported by the education and training. The government needs to protect the public by differentiating those who can use the title of "naturopathic doctor" between those who are medically-trained and those who are not. Scope of practice should also be defined as it is with physical therapists, chiropractors, medical doctors, dentists, nurses and other disciplines under the Board of Health Professions to provide regulations for the protection of patients. I have many patients that see NDs regularly as their primary care doctors, both by choice for natural intervention that does not include prescription drugs and because traditional medicine failed to resolve the problem. I have seen naturopathic treatments improve symptoms in patients with cancers, Graves disease, anxiety, gastrointestinal disorders, multiple sclerosis, POTS and others. The NDs are trained to serve such a primary care role but currently patients must pay out-of-pocket to do so and many have limited access. Many patients with chronic pain or chronic illness of any kind can be helped with naturopathic treatments as a primary or in combination with other treatments. With regulations and licensure, qualified NDs will be available to more people and the cost will be less burdensome. This will alleviate some of the stress in the current medical system and allow patients more choice and voice in their care.

Licensing of medically-trained naturopathic doctors from accredited programs will enable improved access to healthcare, improved safety through guidelines and regulations, increased education and choice by patients and reduced economic burden for the residents of Virginia. I respectfully recommend that the Board implement licensure for naturopathic doctors.

Warmest regards,

Angela Thomas, PT, OCS

VA License 2305212580--  
Women's Health Physical Therapy & Men's Pelvic Health  
Angela Thomas, PT, OCS  
Physical Therapist  
2032 Biems Rd, Suite 202  
Richmond VA 23226  
(P) 804-282-3500  
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[www.obayn-physicaltherapy.com](http://www.obayn-physicaltherapy.com)  
[www.postpartumstrong.com](http://www.postpartumstrong.com)

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August 3, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is April Sharp Garnett, and I have been a student of natural healing remedies for nearly thirty years. I not, however, a naturopathic doctor, nor should I be able to refer to myself as one. I am writing in support of full licensing medically-trained naturopathic doctors. About twenty years ago, I seriously considered pursuing an ND degree, but I decided not to do so because of the lack of licensing in my home state of Virginia. I believe my perspective as both a patient of ND, Dr. Leah Hollon, and my knowledge of the stringent pre-requisites and curriculum to become an ND uniquely qualifies me to opine on this matter.

With every medical profession, it is important to have oversight to ensure accountability and public safety. The process for renewing my Massage Therapy license in Virginia is difficult, but I could call myself a doctor of naturopathic medicine without any basic science knowledge, including basic human anatomy and physiology. This discrepancy in policies baffles and troubles me. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while almost promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors

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are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths,

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which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,  
April S. Garnett

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From: **Shelly Dotson** <shellydotson483@gmail.com>

Date: Mon, Aug 3, 2020 at 5:35 PM

Subject: Letter of Recommendation for Board - Licensing of Naturopathic Doctors

To: <elizabeth.carter@dhp.virginia.gov>

**Shelly Dotson**

Sterling, VA 20164  
shellydotson483@gmail.com

August 3, 2020

Dear Committee Leaders,,

I have been a resident of Virginia since 1994 and have been under the care of Naturopathic Doctor since 2018. I am writing to you to support full licensure for all medically-trained naturopathic doctors. As examples, I have learned a lot about genetic testing, as well as found out that I had a couple autoimmune disorders that went undiagnosed with conventional doctors. This has benefited me greatly and I have been able to learn how to treat the CORE of those issues, not just cover up the issues/symptoms. I have a huge compassion for these doctors and the long hours of medical training they've endured to practice naturopathy. As someone who has spent four decades in the conventional medicine system with a serious congenital disorder, having these doctors to fall back on helps me to understand why and how some of these illnesses occur and whether they are related to my congenital disorder or if they are hereditary.

I am a patient who supports licensure for medically-trained naturopathic doctors; therefore, here are a few concerns I have as it relates to the seven criteria:

- 1) Risk of Harm: Due to my congenital issue, I have to be very careful the conventional medication that I am prescribed which could very easily kill me if I take for long-term. I could get to a point where I could lose all bodily function due to some medications. I have already had many negative issues with medications and vaccines. Some which were needed to live/work overseas.
- 2) Specialized skills: I trust the naturopathic doctors because they have gone through many years of medical training and understand how to correlate conventional medicine with naturopathic (holistic) approaches to help the patient FEEL better and heal from the chronic illness. They are the only medical professionals who understand the drug-herb and/or drug-nutrient interactions and can suggest the best treatments, NOT just cover up symptoms of chronic disease.

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- 3) Economic impact: Licensing medically-trained naturopathic doctors would reduce the impact of our existing system by creating additional access for patients. Licensing would also pave the road for insurance coverage which would give greater access for all citizens of Virginia.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for patients most in need. I, respectfully, urge the board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

**Shelly R. Dotson**

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On Thu, Aug 6, 2020 at 10:38 AM Susan Lukens <[svheyman1@gmail.com](mailto:svheyman1@gmail.com)> wrote:

August 6, 2020

Dear Members of the Committee,

My name is Susan Lukens. I have been a Virginia resident for my whole life, 27 years, and I have been under the care of a naturopathic doctor for around a year. I am writing in support of full licensure for medically-trained naturopathic doctors. Personally, working with a naturopathic doctor has been life changing for me and I've learned so much about my body in such a short time. I have been consistently seeing changes for the better on things that my typical 'doctors' said I'd have to live with for years and years. (For example: hirsutism, hormone imbalances, bad skin, stress)

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Specialized skills** - Anytime I visit my doctor, I cross-check all of my labs and any information I receive with my licensed naturopath. Not only is he able to give me the same exact information the doctor gives me, he is also able to dive in with deeper detail and give me ways that I can fix and prevent the issue - whether it be through food or a natural herb. Something my doctor has no idea how to do. (For a simple example - I had an ear infection and was not allowed to take antibiotics, my doctor basically said 'good bye and good luck' while my naturopath gave me a natural ear drop that cured it in 2 days. Not only curing my ear-infection but also giving me a way to not have to use antibiotics which wreak havoc on your system). I urge the board to recommend licensure for medically-trained naturopathic doctors. I would not want anyone less qualified to be considered a naturopathic doctor.

**2) Scope of practice and Economic impact** - So far my naturopathic doctor has been more knowledgeable, helpful, and has cured more than my 'normal' doctors have done. (including an endocrinologist and other specialists I have seen). He has given me more knowledge of how to fix and prevent my issues in the future. It is frustrating that they still cannot directly order many of the labs and prescriptions that the other doctors throw around like candy - as I greatly believe most naturopaths would be smarter about. I also know many people with autoimmune disease, leaky gut... who would go to a naturopath if they were partially or totally covered by insurance. To the board - please listen to the recommendations of licensure for medically-trained naturopathic doctors as it is one step closer to getting insurance coverage!!! Let's get Virginia healthy!!!

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Best,

Susan Lukens

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On Thu, Aug 6, 2020 at 10:49 AM Kristen Costello <[1kristencostello@gmail.com](mailto:1kristencostello@gmail.com)> wrote:  
Ms. Carter,

I wanted to provide comments to the DHP regarding the recent study completed on Naturopathic Doctors. My comments are based on recent and personal experience.

After seeing numerous physicians around Richmond for conditions such as rashes, weight gain, mood swings, and insomnia, I found myself frustrated and undiagnosed. Each specialist would offer me a new prescription drug to try to see if it would ease my symptoms, as opposed to finding the root cause of the ailments.

I decided to try another route to healing based upon recommendations from others in my personal network. My comfort level was greatly increased in trying a specific practice knowing they were recognized in their field as ND's. A lot of people masquerade as naturopaths, but knowing that the official ones have received specific education, training and experience to hold the ND status is very important to trusting you will receive beneficial care. Licensing naturopathic doctors provides additional safety to the public so that consumers and patients can find credentialed naturopathic doctors vs. lay providers if this is their choice.

In my own experience, a naturopathic doctor was able to get to the root of what was causing many of my symptoms by understanding how they were related to each other. As we have continued to work together, it has been a much more efficient process (with both time and money) to be able to order recommended supplements directly through the practice. It has actually saved me hundreds of dollars of having to research brands and prices on my own. Some brands are obviously much higher quality and therefore more effective than others. Licensing naturopathic doctors provides cost savings and preventive medicine due to finding the root cause assisting with financial savings to patients and helping to restore health.

My health has benefitted so much in the past five months after turning to a ND that I would be hopeful that the scope of their practice could grow to include physical exams, additional labs, and imaging on site as they have been trained to provide and offer in other licensed states. Their knowledge and specialized skills of looking at pharmacotherapy, botanical and nutritional interactions would cost an unbelievable amount of money (and time) if you had to search each out in a conventional manner.

It is my great hope that ND's will be supported and protected by DHP.

Thank you,

Kristen Costello

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W O M E N ' S H E A L T H P H Y S I C A L T H E R A P Y I N C

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Richmond, VA 23226



Cora T. Huitt, PT, DPT, BCB-PMO, IF  
Casey M. Smith, PT, DPT, CSCS, WCS  
Ashleigh Scott, PT, DPT  
Emily Driscoll, PT, DPT  
Angela Thomas, PT, OCS  
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August 5, 2020

Send via email: [Elizabeth.carter.dhp.virginia.gov](mailto:Elizabeth.carter.dhp.virginia.gov)

Dear Members of the Committee,

My name is Dr. Casey Smith and I am writing to you in support of licensure for naturopathic doctors in Virginia. I am a board certified women's health specialist physical therapist and serve as senior therapist at Women's Health Physical Therapy and Men's Pelvic Health in Richmond, VA. Currently, I share approximately 20-30% of my patients with qualified naturopathic doctors (NDs) who have been trained at accredited schools and attended medical residencies. I also refer many of my complicated patients to these naturopathic doctors for personal attention that they sometimes do not get with traditional medicine. I trust the NDs that I work with and I have had many competent discussions over the years regarding diagnosis, plan of care, research-based treatment and a variety of other topics related to patient-centered care.

As a medical professional who works under specific guidelines for state licensing and scope of practice, I believe these regulations and guidelines are important for any aspect of medical care to reduce risk of harm to potential patients. The general public does not know the difference between someone who has appropriate education and training and someone who uses the same marketing but it is not supported by the education and training. The government needs to protect the public by differentiating those who can use the title of "naturopathic doctor" between those who are medically-trained and those who are not. Scope of practice should also be defined as it is with physical therapists, chiropractors, medical doctors, dentists, nurses and other disciplines under the Board of Health Professions to provide regulations for the protection of patients.

I have many patients that see NDs regularly as their primary care doctors, both by choice for natural intervention that does not include prescription drugs and because traditional medicine failed to resolve the problem. I have seen naturopathic treatments improve symptoms in patients with cancers, Graves disease, anxiety, gastrointestinal disorders, multiple sclerosis, POTS and others. The NDs are trained to serve such a primary care role but currently patients must pay out-of-pocket to do so and many have limited access. Many patients with chronic pain or chronic illness of any kind can be helped with naturopathic treatments as a primary or in combination with other treatments. With regulations and licensure, qualified NDs will be available to more people and the cost will be less burdensome. This will alleviate some of the stress in the current medical system and allow patients more choice and voice in their care.

Licensing of medically-trained naturopathic doctors from accredited programs will enable improved access to healthcare, improved safety through guidelines and regulations, increased education and choice by patients and reduced economic burden for the residents of Virginia. I respectfully recommend that the Board implement licensure for naturopathic doctors.

Warmest regards,

Dr. Casey M. Smith, PT, DPT, WCS, CSCS  
VA License 2305210413

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From: Frank Kilgore <[frank@fkilgore.net](mailto:frank@fkilgore.net)>  
Date: Thu, Aug 6, 2020 at 1:53 PM  
Subject: Naturopathic study  
To: <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

Dear Ms. Carter,

As an advocate for better health care and preventive care in improvised regions of Virginia I have visited two fully accredited ND schools, one in Washington state and the other in Arizona.

Just as schools of osteopathy faced similar challenges to be accepted years ago we now know that ODs are well trained and the graduates are much more likely per cent wise to become family physicians in lower income areas.

The added benefit of properly educated NDs from accredited schools is that most impoverished areas, such as Appalachia where I live, need a laser focus on preventive care and community education to help reduce and avoid rampant obesity, diabetes, tobacco, alcohol and illegal drug abuse, coupled with exercise. The stats in Appalachia are very similar to the situation in inner cities.

NDs, and the ND students that are matriculating now and those to come, have and will have a much more pro-active mission to serve as role models for healthy living. Millions of children who are caught up in generational unhealthy eating habits and are particularly exposed to the diseases above, can benefit greatly if specialized health care professionals advocate and represent better lifestyles for emerging generations to help change their deadly trajectories.

ND student rotations in public schools, preventive health clinics and fairs, social media campaigns and other such measures can significantly show underserved children that there is another path and when the person advocating that path is living a healthy lifestyle credibility takes hold.

In fact, having visited half of the nation's accredited ND schools, I am of the opinion that should such schools be allowed in every state, including Virginia, that those states should recruit and encourage the ND decision makers to place the schools in the worst of the worst poor health outcome venues to make a difference.

The shocking stats of self sourced bad health worsen each year so the question is does anyone have a better idea to change this course? Or should we just let each generation fall into the continuous spiral of early onset of disability and premature death? I hope not.

I can be reached at 276-608-0839 if anyone wishes to further discuss this potential role for properly sanctioned ND schools. The return on investment to improve young lives will be richly rewarded.

Thanks, Frank Kilgore, St. Paul, Va

Sent from my iPhone

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August 6, 2020

Dear Members of the Committee,

My name is Amy Maddox I have been a Virginia resident for 30 years and I have been under the care of a naturopathic doctor for 1 year. I am writing in support of full licensure for medically-trained naturopathic doctors. I have greatly benefitted from my naturopathic doctor because she takes my entire health into consideration especially related to diet and natural approaches for my health.

Here is why I support licensure for medically-trained naturopathic doctors:

- I benefit from the fact that my naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.
- I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and knowledge in both conventional and natural medicine.
- I want my naturopathic doctor to provide me more services that she is frankly trained to do! Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. From the patient perspective this creates an added burden - as patients need to then schedule an additional appointment with their primary care provider in order to access labs and basic medications.

I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Amy Maddox  
602 Jackson Street  
Falls Church, VA 22046

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On Thu, Aug 6, 2020 at 5:51 PM Katie R <[flosskat@gmail.com](mailto:flosskat@gmail.com)> wrote:

Dear Members of the Committee,

My name is Kathryn Rohr and I have been a Virginia resident for over 15 years. I have been under the care of a naturopathic doctor for over 2 years now and I am writing in support of full licensure for medically-trained naturopathic doctors. As a patient of Dr., Leah Hollon and Dr. Sarah Giardinelli for over two years now, I have experienced relief from chronic health issues that I was unable to address with western medicine and traditional physicians. Healing and wellness from a patient centered and holistic approach has allowed me to address physical, mental, and emotional healing I was unable to find with other doctors. These two wonderful doctors have spent time listening to my fears, my medical troubles, and my personal concerns. Without their caring and knowledge I would not be able to live the fullest life that I am living today. My nine year old has also been visiting these two doctors for almost two years now. He was born 11 weeks premature and has struggled with medical respiratory and gastrointestinal problems his whole life. Traditional medications and procedures only caused more internal damage and put him at great risks. Natural and holistic healing with NDs has been a blessing for our family and I can't imagine where we would be without them. Their licensure is so crucial so that Virginians can receive quality, safe, and licensed care under these amazing practitioners.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to some of the seven criteria:

1) Risk of harm- Just as my son was at risk under traditional care, I fear the same without licensure in Virginia for NDs. There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from licensed naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia.

2) Specialized skills- NDs are the only practitioners that have ever looked at my son and myself as a complete human being from physical, mental, emotional, and spiritual viewpoints. The countless hours they have spent specializing care-plans is not able to be accomplished in allopathic medicine under our current healthcare system. Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.

3) Scope of practice- I feel that it is important for NDs to be licensed so that they are able to include comprehensive care that traditional practitioners provide everyday without all the information NDs have. NDs are certainly in a position to be able to include these practices while still viewing the patient holistically. Currently, medically-

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trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. From the patient perspective this creates an added burden - as patients need to then schedule an additional appointment with their primary care provider in order to access labs and basic medications. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services - including prescriptions, such as basic antibiotics and anti-hypertensives. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.

4) Economic impact- Let's face it..... the healthcare system is overwhelmed! They clearly are not able to meet all the needs of the public. Why are we getting "more knowledgeable" as a society but yet our people are getting sicker and sicker by the year? Something doesn't add up.... we need alternative medicine practitioners and NDs who are licensed and regulated to help view healthcare from another angle. The impact, ripple effect, could be huge and could spread a wellness trend across the world. Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia. Our family would be lost without NDs. I am thankful that I had the knowledge to find licensed and trusted NDs to work with. But it wasn't easy. The people need to have a regulated profession they can follow and get on board with. Everyone's health can stand to benefit from licensure. Thank you for your consideration on this matter and best wellness wishes to you.

Sincerely,

Kathryn, Thomas, and Ian Rohr  
Kathryn Rohr, RDH, BA

43 40

On Thu, Aug 6, 2020 at 6:11 PM Zen Loki <mikeloki93@gmail.com> wrote:

6 August 2020

Dear Committee Members,

My name is Michael Sandy and I have been a resident of the great state of Virginia all my life. For the last twelve months I have been under the care of a naturopathic doctor, Dr Leah Hollon. I write to you today to support the full licensure for medically trained naturopathic doctors.

For the following reasons I support licensure.

- 1) Specialized skills: Dr Hollon is the first to treat me and my ailments in a holistic manner and taking into account all aspects of my life, health and general well-being and in other words it is a holistic approach. After receiving treatment by conventional physicians my entire life I find this type of practice far superior for addressing the issues I have. Her methods get directly to the root cause instead of merely treating symptoms. I am certain that if I had been under naturopathic care all my life, I would have far fewer health concerns and crises throughout my many years.
- 2) Scope of Practice: Every doctor wants the most tools possible to care for their patients and Naturopathic doctors are no different. Dr Hollon could certainly use a full tool set available to licensed doctors to order labs, take images and give physical exams. Under the current scheme she can not. Having these tools will give her and all Naturopathic doctors the ability to enhance their practice and improve patient care with a more comprehensive treatment.
- 3) Doctor shortage: Within the next ten years two out of five doctors will retire. In another three years there will be an estimated doctor shortage of nearly 140,000. This will have the most detrimental effect among lower income patients and the elderly since both groups generally have a greater need for medical care. We need to have as many doctors in practice as possible to avert this looming crisis. Licensure of medically-trained naturopathic doctors will provide additional healthcare access for patients most in need.

Additionally I want to state that the care received through Dr Hollon has been nothing short of miraculous. After stage 4 cancer treatment, I was alive but my body was severely broken. In fact for over two years I could not swallow food and had to feed myself with a gastro-tube. The licensed doctors, including specialists, basically told me "it happens" but could not help me. Dr Hollon has gone above and way beyond both my expectations of care and treatment in order to get me back to one hundred percent functionality again.

In light of my personal experience and the compelling reasons listed above, respectfully, I urge the Board to recommend full licensure for naturopathic doctors in our state. Give them the tools they need and make Virginia an even better place to live.

Sincerely,

Michael Sandy  
804 912 9250

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August 6, 2020

Dear Dr. Elizabeth Carter,

I am writing in support of regulation of the practice of Naturopathic Doctors in the Commonwealth of Virginia. I was first introduced to naturopathic medicine in 2016, after my own personal health began to decline. I had been seeing many specialists over a 10-year period of time with no one able to determine what was going on with me. I was at a point where I was chronically sick and getting sicker every year. It was greatly affecting my job and my personal life. A friend recommended naturopathic medicine and I'm happy to say, that my ND was the one that put all the pieces together that lead to my diagnosis. Now that we know what is going on, we know how to treat it. I'm so unbelievably thankful for my ND's knowledge, training and commitment to me as her patient. I credit her with helping me get my life back! I consider my ND as one of my primary physicians, but she is not licensed to run labs and other tests in Virginia. I'm incredibly thankful for the collaboration and teamwork that occurs between my ND and my PCP, but I believe that ND's should be able to practice autonomously while collaborating with other physicians. My ND and PCP communicate regularly and work together to care for me. We need more of this in today's medical field. We need patients that do not fit into any box, like me, to have access to a wider scope of health care which should absolutely include medically-trained and regulated naturopathic doctors. If we do not regulate who can practice as an ND in the state of Virginia, then we jeopardize the care that is provided to patients and ultimately, their health.

I personally work as a pediatric physical therapist and therapy director and I treat patients with many complex needs. On a daily basis, I use every bit of my education and training to provide the most evidence-based care to my patients. I am finding that more and more patients do not fit into "the box" of just one route of medical intervention. I personally have referred patients to ND's in order to gain a more holistic view of my patient and their complex needs. I rely on the ND's education and ongoing training to provide the highest level of care to the patients I refer to them.

In closing, I strongly support the regulation of naturopathic medicine in Virginia. This will enable medically trained ND's to practice more fully to the extent of their education and training, while safeguarding public health and creating transparency. Thank you for supporting this important matter!

Best Regards,  
Wendy Bryant, MPT  
Physical Therapist

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On Thu, Aug 6, 2020 at 9:46 PM Lindsey Reed <lindseyc316@gmail.com> wrote:

Dear Members of the Committee,

My name is Lindsey Reed and I have been a Virginia resident for 7 years and I have been under the care of a naturopathic doctor for over 4 years. I am writing in support of full licensure for medically-trained naturopathic doctors. I have received excellent care from my naturopathic doctor, and she has been able to provide answers, treatment and solutions for chronic pain, chronic cough/sinus issues, and a variety of other issues I've struggled with for over a decade without answers, and without the appropriate care and consideration from all Medical Doctors I sought care from first.

As a patient who supports licensure for medically-trained naturopathic doctors, here are some concerns I have as it relates to the seven criteria.

**1. Specialized Skills:** When I first sought care from my medically-trained naturopathic doctor, I had experienced severe and chronic knee pain for over 5 years. I saw multiple orthopedists, two rheumatologists, and had more X rays and MRIs than I can count. I had 3 knee surgeries with at least 6 months to a year of physical therapy after each procedure and was given numerous diagnoses, that were actually more like "best guesses" from the orthopedists, and no one gave a clear cause or consistent diagnoses. I would spend months trying every treatment recommended by these doctors and have to take a break after no progress and endless frustration from these specialists telling me they couldn't do anything else for me before passing me off to the next specialist. My naturopathic doctor listened to my extensive history, and stuck with me to rule out multiple chronic illnesses, making connections from medical history during my teenage years that not one other doctor even bothered to ask about. I was diagnosed by my naturopathic doctor with Complex Regional Pain Syndrome, and the acupuncture she provides for me regularly is the only thing that has had any success in reducing my pain levels. She didn't stop there, she took a holistic approach of my entire medical history, and has since helped me get rid of a year long chronic cough with no prescription medications with serious side effects, only additional supplements and acupuncture treatments for my sinuses. Since she first addressed my cough with me, I have had such minimal seasonal allergy issues (that I believed may have attributed to 6 months of coughing) and by taking her recommended supplements, I have been able to prevent and/or significantly shorten the length and severity of colds. I am confident that given my past experience with traditional MDs, no one else would have paid attention to, or been able to help this issue as thoroughly, quickly and efficiently. It is this consistent, proactive, holistic care that has built such trust in my naturopathic doctor that she is always the first person I go to with any medical concerns.

**2. Scope of Practice:** My previous points lead me to my next concern. When my naturopathic doctor was helping me determine what she eventually diagnosed as Complex Regional Pain Syndrome, all blood work and other tests or prescriptions had to be submitted to insurance through my Primary Care Physician, who I only see for my annual physical exam. My PCP spends about 10 minutes in the room with me, while she reads her standard check list of medical questions and barely makes eye contact, and she certainly does not establish a relationship where I feel comfortable bringing up any additional concerns. When I have brought up concerns, she has prescribed medication that is risky and not helpful, or often asks me if I've already spoken to my naturopathic doctor, knowing full well that the ND has a more comprehensive understanding of these issues and how they impact me personally. I am fortunate that my PCP has a strong working relationship with my ND and trusts her, but I can only imagine how

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On Fri, Aug 7, 2020 at 6:32 AM Cathy C <threeconnells@gmail.com> wrote:

Dear DHP representatives,

**I write to you in regards to the licensure of Naturopathic Doctors in Virginia. Given my personal experience with two vastly different individuals that both use the term Naturopath, I think this is of utmost importance in ensuring Virginians have full transparency about the services they will receive. I have complex chronic health issues, and sought the help of a Naturopath in improving those conditions. The first Naturopath I worked with was a lay Naturopath that provided me options to the best of her abilities, what I did not realize was how limited those abilities were. After working with this particular Naturopath for about a year, and having limited progress and some set backs, I inquired about her training. When I found out she earned her degree online I was deeply disappointed. My expectations for quality of care could not be met with an online trained lay Naturopath. I did not realize that people could legally use the term Naturopath without medical training**

**I later did my own investigation and found a Naturopathic Doctor who had attended medical school, who has helped me achieve a level of healing that is nothing short of miraculous. I ask you to please have Naturopathic Doctors licensed in Virginia so that citizens can make an informed choice. I didn't know what I didn't know, and it cost me. I hope that greater transparency can be achieved through licensure. This would not only achieve cost savings for the public (I incurred significant costs for ineffective treatments with the lay Naturopath) but prevent harm and confusion to the public.**

Regards, Cathy Connell, Roanoke, VA

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challenging this gets for those who aren't as lucky. Further, as a patient, I do not want to have to schedule an additional appointment with an additional cost, just to have the recommendations carried out by someone less knowledgeable about my medical history and my needs. This is an unnecessary financial and scheduling burden not just to me as the patient, but to the healthcare system as a whole.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Lindsey Reed

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Alliance for Natural Health USA  
1011 E. Jefferson St #204  
Charlottesville, VA 22902  
(800) 930-9762  
www.anh-usa.org

August 7, 2020

Virginia Board of Health Professions  
Attn: Laura Jackson  
9600 Mayland Drive, Suite 300  
Henrico, VA 23233

Dear Members of the Virginia Board of Health Professions:

On behalf of the Alliance for Natural Health USA (ANH), I am writing to urge the Board to recommend licensure of Naturopathic Doctors (NDs) in Virginia. ANH is a nonprofit organization representing one million consumers and healthcare practitioners across the U.S.

ANH protects the right of natural health practitioners to practice, and the right of consumers to choose the healthcare options and treatment modalities they prefer, including complementary and alternative medicine. We believe a system that is single-mindedly focused on "treating" sick people with expensive drugs, rather than maintaining healthy people, is neither practical nor economically sustainable. NDs directly support this aim, working with patients to support long-term health by focusing on the root causes of illness, as opposed to simply treating the resulting symptoms.

As so many Virginians suffer from acute and chronic illnesses that require personalized, holistic treatment, the need for access to licensed NDs in Virginia is clear. NDs who have graduated from accredited, four-year naturopathic medical schools, are educated and trained to practice naturopathic medicine to a scope that meets each of the seven criteria used to evaluate the need for a health profession's regulation in Virginia. Consumers demand access to various types of practitioners, and they should have the ability to choose the practitioner that fits their unique needs, including licensed NDs and traditional naturopaths. ND licensure should allow NDs to use their full education and training by permitting a defined scope of practice that includes diagnosis and treatment.

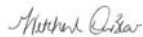
Importantly, ANH supports the licensure of NDs to practice to the level of their skills and training, while still preserving the rights of traditional naturopathic practitioners with alternative educational backgrounds, other than naturopathic medical school, to continue to practice as they have been in Virginia. As the Virginia Department of Health Professions' preliminary report on ND regulation states, "If practice is limited in the Commonwealth to only those naturopaths able to be licensed in the state, there may be an increased cost to the consumer based on the simple economic principle of supply and demand." By permitting access to both licensed NDs and

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traditional naturopaths, consumers would be better equipped to distinguish between NDs who have gone through formal training and those who have trained more informally, and they would have the right to decide the health professional that best meets their individual needs.

Open and fair markets, in which consumers can decide what credentials and level of education they seek in healthcare professionals, guarantee the best outcomes. ANH urges the Virginia Board of Health Professions to recommend ND licensure to the Virginia General Assembly.

Respectfully submitted,



Gretchen DuBeau, Esq.  
Executive and Legal Director  
Alliance for Natural Health USA

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#### SCOPE OF PRACTICE:

With the current state of things, I need to jump through hoops and unnecessary visits to other physicians just to get simple but important procedures like blood labs done. The NDs in Virginia under our current status are functioning in a very limited capacity – far narrower than their education and training. Licensure will help Virginia NDs be able to offer the highest level of wellness care for our citizens, a particular bonus during things like the current Covid crisis, as well as the fact that many physicians are leaving primary care practice, and currently leaving consumers who need a healthcare practitioner with far less choices.

The support of Licensure presents clear benefits to the health of Virginians. I hope I can count on you to support a solution to something that is currently harming our health status and healthcare freedom. Thank you for your consideration.

Respectfully,

Elizabeth Schmohl  
Richmond, Virginia  
804-683-1888

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On Fri, Aug 7, 2020 at 8:35 AM Beth Schmohl <bethschmohl@gmail.com> wrote:

August 7, 2020

To Whom It May Concern:

I am writing to urge your support for the licensure of Naturopathic Doctors (NDs). This will, without a doubt, significantly improve the health of Virginians, prevent the public from unsafe practices, give Virginians better access and choice to unique, quality, more holistic healthcare, and reduce the cost burden of healthcare overall.

I am a firm believer in the multitude of benefits for our society as a whole with the preventative nature of naturopathic medicine, but I will keep my comments to within three of the criteria of why this profession absolutely needs to be regulated by the state of Virginia:

#### RISK FOR HARM TO THE CONSUMER:

The current unregulated practice of naturopathic medicine in our state can, and will, harm many Virginians' welfare! Appropriately trained naturopathic doctors provide a safe, effective, and affordable means of health care; and licensure of naturopathic doctors helps provide the assurance to the consumer that their ND has undergone the rigor of one of the four naturopathic medical schools in the United States. Many states already regulate naturopathic doctors with boards that ensure patients receive safe and effective treatments from qualified doctors. When one moves to Virginia, many do not realize that almost anyone can claim to be a "naturopathic" practitioner!

#### SPECIALIZED SKILLS AND TRAINING:

Naturopathic doctors are unique in their approach and provide a WEALTH of benefits to their patients. They combine the scientific rigor and evidence-base of conventional medicine with nutrition, stress management, and therapeutic lifestyle changes to help patients prevent, treat, and reverse the epidemic of chronic diseases afflicting our country today.

The evidence is clear that our current healthcare system is lacking when it comes to chronic disease. Naturopathic doctors are skilled in preventing and treating chronic disease. Appropriately trained naturopathic doctors provide a safe, effective, and affordable means of health care; and licensure of naturopathic doctors helps provide consumers more reliable choices in their health care.

There is no doubt in my mind that many chronic diseases are preventable and are linked to lifestyle choices. Our top priority should be a health system with interventions that will improve the effective delivery and other preventive services in order to prevent disease and reduce or eliminate risk factors due to chronic diseases. I personally have benefitted from working with a qualified ND as I navigate my own health concerns and family history through a more preventative and holistic approach.

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On Fri, Aug 7, 2020 at 10:26 AM Jina Nguyen <jetaime0424@yahoo.com> wrote:

Dear Members of the Committee,

My name is Jina Nguyen. I have been a Virginia resident for 40 years and I have been under the care of a naturopathic doctor for over 5 years. I am writing in support of full licensure for medically-trained naturopathic doctors. I have been treating naturally for my cold, flu, constipation, allergy, etc. with safe, no side effects at all. It is a huge thanks for the ND to care for me more than my previous primary doctors.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the two criteria.

**1) Scope of practice.** Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot even test for COVID-19 or run a basic complete blood count. I strongly believe that the BHP needs to grant naturopathic doctors access exactly the same way as the primary care providers due to the emergency of the pandemic and shortage of primary doctors. It is up to the patients to choose their own doctors who care for them and the family in a safe natural way. There are too many abusive drugs with side effects that kill people every day. How do you feel if it is your own child, parents, or your loved one? I urge YOU as a member of the Board to recommend licensure for a naturopathic doctor.

**2) Economic impact.** Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Currently, medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. This is not fair that naturopathic doctors who fulfill their dreams as spending the same amount of school as other doctors to help the patients that the state of Virginia denies licensing that the insurance denies the coverage. This is human life not a competition between doctors. My family and I have been treated by ND with their NATURAL heart for years without insurance coverage. I highly recommend the Board to approve this practice with their PURE heart as well.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Jina Nguyen

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On Fri, Aug 7, 2020 at 11:18 AM Sarah Litchfield <Sarah.litchfield@gmail.com> wrote:

1. Because no two individuals are alike, it is important to keep in mind that access to health care information should always be available and accessible to the general public from any person or source.

2. Immunity weakens with age; therefore, we must increase our wisdom while broadening use of natural immune modulators.

from the experience of 80 year-old Sarah

Sarah **Sherwood** Litchfield  
434-589-1843  
434-242-1633 cell  
3 Ponderosa Lane  
Lake Monticello  
Fluvanna County  
Palmyra, VA 22963

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From: Reg Taylor <regtaylor11@gmail.com>  
Sent: Sunday, August 9, 2020 9:00 PM  
To: laura.jackson@dhp.virginia.gov  
Subject: Fwd: Diagnostic Medical Sonograph Study

Sent from my iPhone

I wish to express my opinion regarding access and the usefulness of nutritional information (i.e. herbs & vitamins) for the maintenance of a person's good health.

Restricting the flow of this type of information in any way would be a great disservice to the residents of the State of VA. Sincerely,

- Reg Taylor;
- 1725 Providence Villas Court,
- North Chesterfield, VA 23236

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From: **Ari Julius** <arijulius@gmail.com>  
Date: Fri, Aug 7, 2020 at 7:28 PM  
Subject: Letter in Support of Naturopathic Doctors  
To: elizabeth.carter@dhp.virginia.gov <elizabeth.carter@dhp.virginia.gov>

Good Evening,

Thank you for giving me this opportunity to support my Naturopathic Doctor. I don't know where I would be without their guidance and support.

Have a wonderful weekend,

Ari Julius

August 7, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors. My name is Aristides Julius and I have been a patient of Naturopathic medicine for over 3 years.

**Risk of Harm:** Creating a licensure for "naturopathic doctor" will go a long way to legitimize this group of medical professionals in the eyes of the public, government official, and insurance companies.

**Specialized Skill and Training:** Due to a naturopath's unique training, they have a clearer understanding of the human body and how it works. Naturopathic doctors go through a four-year medical program and complete board exams in basic sciences.

**Economic impact:** Currently, seeing my naturopathic doctor is expensive with neither Supplements nor the time with the practitioner being covered by insurance. In an ideal world, "medical grade" supplements would become available and be covered by insurance as well as the visit.

**My personal experience:** Over the years, I have seen many doctors and I have given them the same list of concerns. I can summarize the typical doctor's process as follows: they half listen to the patient, waiting for key words which allow them to bill the insurance company for Test A or write a script for medicine Y. I went to a neurologist about headaches and the neurologist did not care if it could be caused by muscle tension, their solution was to inject you with Botox, or give you a pill. Another time, my Primary Care Provider gave me muscle relaxants because my jaw hurt from grinding my teeth. He did not give me an exam and did not follow up with the Oral/Facial Surgeon who also told me to take muscle relaxants. Instead, he just gave me a generic dosing which did not work to alleviate any pain or stress on my jaw.

When I met my naturopathic doctor and told her my story, she mapped out a whole-body therapy for me which included tinctures, supplements, mindfulness, and specific workouts. Months later, I am feeling great. I am getting the best sleep I have had in years, the pain in my jaw has reduced significantly, and I have better range of motion of my shoulders and neck.

Licensing medically training naturopathic doctors will create additional safe healthcare access for all Virginians. I urge the board to please consider licensing naturopathic doctors.

Sincerely,

Aristides D. Julius

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----- Forwarded message -----

From: **Mary Claire Julius** <marvcjulius@gmail.com>  
Date: Fri, Aug 7, 2020 at 7:35 PM  
Subject: Naturopathic Doctors Licensure Support  
To: <elizabeth.carter@dhp.virginia.gov>

Elizabeth,

Please see my attached letter of support for Naturopathic Doctors licensure in Virginia. My ND has been so beneficial to my overall health, I can't imagine not having her in my life.

Thank you,

Mary Claire Julius

August 7, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors. My name is Mary Claire Julius. I have lived in Virginia for 33 years and have been a patient of Naturopathic medicine for over 7 years.

**Risk of Harm:** The general public does not know the difference in levels of education, training, and experience between a medically trained naturopathic doctor and a traditional or lay naturopath. Creating a licensure for a "naturopathic doctor" will go a long way in legitimizing these professionals within the state of Virginia.

**Specialized Skill and Training:** Naturopathic doctors complete a four-year medical program and complete board and licensing exams. Naturopathic doctors are experts in their field related to natural therapies and understand the interactions within other forms of medicine such as nutritional and botanical medicine.

**Scope of Practice:** Naturopathic doctors are trained as primary care providers and can serve as additional providers for chronic disease, addiction, and mental health illnesses.

**Economic impact:** Licensing will increase the number of naturopathic doctors in the state of Virginia, which will increase patient access and reduce overall costs. Currently, naturopathic patients are having to pay for health care services out of pocket which costs hundreds to thousands of dollars a year. All Virginians should have the right to access this form of medicine and have their insurance cover it.

**My personal experience:** Through the years, I have seen many healthcare professionals. I floated from one doctor to another without getting a clear answer to my needs. Over 7 years ago, I was in a minor car accident. A friend told me about Naturopathy medicine when I complained of muscle strain and tension. She said I should research it to see if it would be a good fit for my needs. It led me down a rabbit hole of information and I became interested in holistic healing.

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Unfortunately, I did learn through research that ND's are not licensed in the state of Virginia and insurance does not cover this form of medicine. In order to afford care, I had to continue to live with my parents for 3 more years as I could not afford shared rent with a friend and naturopathy medicine. This decision changed my life, as I finally found a doctor who was caring, compassionate, and interested in helping me instead of feeding me pain pills.

My naturopathic doctor helped me get off of medication that was prescribed to me years prior for a childhood diagnosis of Dyslexia. When I had previously visited my primary care physician and expressed interest in weaning off the medicine, the response I got was, "That has never happened before for one of my patients." Due to the care of my naturopathic doctor helping me become more healthy, I was able to wean off these medications. My PCP was surprised that the hard work we have done allowed to me to get off of my medications.

Since then, my naturopathic doctor has worked with me on losing weight and balancing my hormones. I had previously been told by another medical professional that I may be unable to bear children. Thankfully, my naturopathic doctor didn't believe that was the case at all. With her help, my husband and I welcomed our sweet baby girl in 2019. My naturopathic doctor was there to help with lactation support, pain management, and supplements to ease the post-partum sleepless nights we experienced.

Licensing medically trained naturopathic doctors will provide Virginians with addition and safe healthcare access to all. I urge the board to please recommend licensure for Naturopathic doctors.

Sincerely,

Mary Claire Julius

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were benefits), seemed to discount what I would tell them about my symptoms and my lack of history. And, how I was feeling. What my body was telling me. I was listening, but could not find anyone else to listen along side me.

The primary distinction for me is that in each of these instances the doctors instead chose to run more tests than I can remember, but the stack of test results and papers is at least three or four inches thick. It cost me and my insurance many thousands of dollars.

And, no recommendations for care. Except, in a few instances, some type of prescription medication. Or, more medical testing.

What about the Hippocratic oath?

For me, that's where the medically trained Naturopath comes into play. The body is, next to nature and trees, one of the most amazing and dynamic entities and it is actually designed and wants to heal itself and to maintain constant stasis.

Sometime, we just need a little help and/or direction. That's where the medically trained naturopath comes into play. But, it is a partnership between the doctor and the patient. We need to work together for our success in restoring health. The body, mind and spirit work towards it every second of every day. Provide it support, give it direction, goals, knowledge. All powerful healing.

One of the most amazing aspects of the human body is its ability to heal itself. My experience with naturopathic doctors is that this is first and foremost on their mind. Focus on care that allows the body to heal itself! With as little synthetic intervention as possible.

As a patient who supports licensure for medically trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Specialized skills** -- Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.

**2) Economic impact.** Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.

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On Fri, Aug 7, 2020 at 8:37 PM Theresa Niemeier <[wdctcat@aol.com](mailto:wdctcat@aol.com)> wrote:  
Dear Elizabeth

Attached please find my letter in Support of Licensure for Medically Trained Naturopathic Doctors.

Thanks for your attention, and that of the Board for your consideration.

Sincerely

Theresa J Niemeier  
Alexandria, VA

August 7, 2020

Dear Members of the Committee,

My name is Theresa Niemeier. I have been a Virginia resident for 35 years and I have been under the care of a medically trained naturopathic doctor in Virginia for two years. (I have been under the care of medically trained naturopathic doctors in other States previously -- it's just hard to find one in Virginia!).

I am writing in support of full licensure for medically trained naturopathic doctors.

Having run the gamut with other licensed professionals for my care, including "traditional Medical Doctors, Integrative Doctors and other specialists", I continue to be at a loss for the plethora of testing and prescription medication and supplements that were being prescribed for me and, after fifteen years of "care", not making enough progress to allow my body to operate efficiently and to return to stasis -- full health.

I and my body have been screaming for help for quite some time. The most critical component for me in choosing a medically trained naturopathic doctor is that they understand BOTH allopathic medicine and can prescribe medications when necessary along side natural remedies and lifestyle choices, diet and exercise. Balance.

Fortunately, I kept pursuing options for "holistic" care by a medically trained naturopath. Finally, all the stars aligned for me in Virginia and I have come across a practice that has helped and is continuing to assist me with my goal of restored health.

The primary adjunct for me with this relationship is that, as an adopted at birth adult, having no family history or any idea of a family history, yet having struggled with auto-immune related dysfunction most of my life, we started with my blood type and my DNA.

It's fascinating for me, as I am sure is true for many who do not know it, the "less is more" approach is much more effective and my body is much more responsive. It's providing support, but not reprogramming or remapping my body due to a prescription that causes my body to stop doing its job and letting the drug take over. Disharmony at work and not a long term solution. In fact, likely creating a slippery slope.

Ha! With over fifteen years of "traditional" care, every doctor seemed to disregard the fact that I had no family history to look at and, even worse, each experience (while there

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Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. Ultimately, costing patients and insurance companies less money AND getting much better results and outcomes.

I respectfully urge the Board to recommend full licensure for medically trained naturopathic doctors in Virginia.

Sincerely,

Theresa J Niemeier

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From: amy <amy@nesh.com>  
Date: Fri, Aug 7, 2020 at 8:57 PM  
Subject: Letter in support of Legislation for Naturopathic Doctors in Virginia  
To: <elizabeth.carter@dhp.virginia.gov>



August 8, 2020

Virginia Board of Health Professions Regulatory Research Committee

Dear Members of the Committee,

The Massachusetts Society of Naturopathic Doctors is writing in support of the licensure effort for medically-trained naturopathic doctors.

Up here in Massachusetts our bill was signed into law in 2017, followed soon by Rhode Island, completing all New England states. There is clear risk to public health by *not* licensing naturopathic doctors as many individuals, without any medical training hold themselves out to be naturopathic doctors. Clear harm *has* been done and will continue to be done if licensure does not take place, as there is no way an uninformed public can appreciate the difference. Licensable naturopathic doctors work independently, and follow indicated referral patterns both to and from our licensed medical colleagues.

ND have unique skills that encompass whole person, natural medicine, the capacity to diagnose and treat disease. We are specialist in preventive care and work to help patients reach optimal health. A large percent of chronic ailments in this country including heart disease, diabetes and cancer are lifestyle-preventable and license naturopathic doctors are uniquely trained and qualified to deliver medical care to manage treatment and where possible, reverse these ailments.

There is economic harm to Virginia as at this time, many patients see NDs licensed to practice in nearby jurisdictions such as Maryland and Washington DC. Similarly, there are many NDs who live in Virginia, but practice across state lines in order to practice in a state where they are licensed, thus income tax loss to Virginia. But most importantly, preventive, natural and whole-person many has the capacity to save health care dollars, often one of the largest line items in any state budget.

During this time of COVID-19, we need more medically trained individuals, especially those who can help people address underlying ailments which have them more susceptible to severe reactions to this virus. Additionally, Virginia, like many states is facing a severe shortage of primary care doctors in the coming decades. Naturopathic doctors can help fill that gap.

The MSND strongly supports licensing of medically-trained naturopathic doctors by the Commonwealth of Virginia, and encourages the Board to make a strong and well informed recommendation for licensure.

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On Sat, Aug 8, 2020 at 11:25 AM Julie Aida <purplewild@hotmail.com> wrote:

Hello my name is Julie. I'm a woman who has been on a long and painful Journey. Part of my Journey lead me to Richmond Natural Medicine. This happened because I was in Elwood's Thompson a local health store in Richmond, Virginia. I met a young nutritionist who suggested Richmond Natural Medicine.

So my Journey began with NP doctor Hollon. Let me state I'm a nanny so financially not the easiest to pay for any medical stuff. So worth going to See NP Hollon out of pocket. She was thorough and tested me for things Doctors had never considered. I was treated as an individual with individual problems. Yes I truly believe that is a MAJOR problem in our healthcare today, along with cost.

At this point you maybe wondering what my painful and long journey was and is??? Well let me tell you, Infertility. Through all the testing we figured out I had a lot of food Intolerances and MTHFR. Huge information I needed to know so I could change how I eat and live my everyday life. One of my intolerances is fruit, ha ha raised a Vegetarian.

Even though we pulled out all the stops I still was not able to get pregnant at that time. So being a very responsible NP, NP Hollon suggested I see a Infertility's Specialist.

After crazy testing from the Infertility Doctor. We were said to have unexplained infertility. Might I add at first the Doctor said everything we wanted to hear, seemed caring. After that I felt like a number. Worst feeling ever to be ignored and treated as a number.

Story is getting longer but nothing should be left out. So before first infertility treatment, what !!! I'm pregnant ☺!!! We are over the moon 🌙. 7 weeks in start to bleed ☹, yep first Miscarriage.  
Okay we actually go to doctor for infertility treatment, First Huge mistake for my own personal body was taking clomid. First hint of a major problem were the huge toad bumps emerging out of my elbows. I keep going I want to get pregnant right????? Suck it up buttercup it's all part of what you have to do right????  
Well it's even more fun near the end taking Clomid my vagina would burn. I tell the Doctor, looks directly into my face and says that not a side effect. I take his cold answer because yet again I just want to get pregnant right?????  
Outcome after several procedures no pregnancy and a lot of money. Left feeling like a number and uncared for.

Go to NP Hollon who thank goodness ☺ checks my hormone levels. My estrogen is skyhigh at this point. No baby and having high estrogen at this point. She immediately puts me on a plan to lower my estrogen. Then another side effect of taking Clomid shows up. I start literally pooping in my pants. My lowest point of this was when I was walking down the hall leaving from babysitting and I literally pooped in my pants the only thing that saved me was I was wearing thick underwear. I'm headed to my next job so I have to drive in my car with poop in my underwear and quickly clean up before the girl I watch gets off the bus. At this point I contact my NP. NP Hollon knew exactly how to treat this problem I was now having. After a month of very safe natural medicine for my individual body, it was cleared up. Wow what a difference, to be heard, to be treated properly and not like a number. Who wants to be a number????

I still continue to see my NP Hollon and she continues to watch over my overall health and wellness. She assess me each time to make sure that there's nothing new going on in my life that needs to be taken care of or dealt with. Again she's very honest and very thorough.

Sent from my iPhone

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If you would like to speak with me on any of the above points, please do not hesitate to reach out. Thanks for your time and consideration.

Respectfully,

Dr. Amy Rothenberg  
Immediate Past President MSND  
American Association of Naturopathic Physicians 2017 Physician of the Year  
MSND Legislative Chair

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On Sat, Aug 8, 2020 at 11:40 AM Lea Sloan <lea\_christy.sloan@gmail.com> wrote:  
Dear Members of the Committee:

I appreciate the work you are doing regarding regulation of the practice of naturopathic doctors in Virginia. My name is Lea Christy Sloan and I have been under the care of a naturopathic doctor since 2013. As the board considers licensure, I am writing in support of fully licensing medically trained naturopathic doctors (NDs.) As a licensed psychotherapist in private practice, I am committed to the importance of oversight and accountability. The majority of the public does not know the difference between a licensed and non-licensed professionals and it is my concern that Virginians are protected by the assurance of medical education, training and continuing education. This will create safe medical care for the residents of Virginia who seek out naturopathic doctors.

As you know, medically trained naturopathic doctors require rigorous education and training as well as the requirement for licensing exams in various therapies including pharmacology, nutrition, botanical therapy and physical medicine. Particularly, but not only, in this time of this widespread pandemic, skilled NDs can provide preventative care which will increase the health and wellbeing of the community as well as assist individual patients with protocols that ensure the best response given particular underlying conditions.

It is particularly important for Virginians to have access to more care given the shortage of medical professionals. As a matter of public health, licensed NDs can provide widespread care independently but also in conjunction with other licensed health professionals in the state. In addition, because naturopathic doctors in VA are not licensed they are unable to use coding so that patients can submit their services to insurance companies which results in higher costs for health care. With licensure, this will change and the economic impact will be widespread as health care costs will not dominate Virginians' spending ability when they require medical care. Given the community spread of the pandemic, more Virginians often have to choose between medical care and other expenditures bringing hardship to them and limiting their ability to purchase other goods and services.

Licensing medically trained naturopathic doctors will provide additional, safe, affordable healthcare across the Commonwealth of Virginia. I respectfully urge the Board to recommend licensure and give more Virginians access to safe, cost effective and accountable health services.

Respectfully submitted,

Lea Christy Sloan, M Ed, LPC, BCC  
147 N Park Drive  
Arlington VA 22203

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On Sat, Aug 8, 2020 at 2:21 PM Beth LaGrant <[beth@bethlagrant.com](mailto:beth@bethlagrant.com)> wrote:

Dr Carter,

Please find in the attached my personal letter in favor of the pending legislation for the licensing of Naturopathic Doctors in Virginia.

Thank you for your consideration.

Respectfully,

**Beth L. LaGrant**

4904 Old Main Street  
Henrico VA 23231  
(804) 577-0002 cell  
[beth@bethlagrant.com](mailto:beth@bethlagrant.com)

August 8, 2020

Board of Health Professions  
C/O Dr. Elizabeth Carter

To Whom It May Concern:

I am writing on behalf of my support of the licensure for Naturopathic Doctors in the State of Virginia. There are many reasons to support licensure under the proposed legislation, but I will focus on 3 of the "criteria" that I believe are most critical to patients like myself.

While living in California in 2012, I started experiencing a vast number of symptoms and health problems that were seemingly unrelated. I visited my PCP, my gynecologist, my dermatologist, an endocrinologist, a neurologist, a pain specialist, etc., and proceeded to have numerous procedures, injections, treatments and medications that did nothing for my pain or my overall health. After a couple years, I finally asked myself, "Is it possible all of my symptoms are somehow related to one or two issues instead of the 10-12 issues I was being treated for with western medicine?". Nothing was helping or alleviating my symptoms and I was getting worse, not better. So, I started seeking answers outside of western medicine. In late 2013, a friend with Lyme disease referred me to my first Naturopathic Doctor (ND). This is the beginning of my journey to getting to the bottom of my deteriorating health that has continued to this day with a naturopathic doctor that I have seen since moving to Virginia.

My naturopathic doctor looks at the entire picture of my health, not just her specialty, as with a western doctor. This speaks to a NDs specialized skill. She has been able to identify illnesses and symptoms that are related to food, medications, environmental and other agents almost immediately. Her wide scope of seeing the body as a whole is unique and frankly, the only one I trust over countless western medical doctors. She sees the whole me and treats me as such. I had a procedure years ago that was causing symptoms of a condition I now have under control that caused me to have to give up my ability to have children. Had I been working with an ND at the time instead of a MD (who took maybe 15 minutes to determine what was going on), I probably would not have had to have the procedure to cure my symptoms. This is critical for people like me who have multiple issues that a MD does not have the time (due to insurance constraints), to work with and address the whole picture of health.

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On Sat, Aug 8, 2020 at 12:45 PM Linda Terry <[lerryathome@comcast.net](mailto:lerryathome@comcast.net)> wrote:  
August 8, 2020

To whom it may concern at the Department of Health Professions (DHP):

I am writing in support of licensure in the state of Virginia for naturopathic doctors. I have been a patient at Richmond Natural Medicine for three years under the care of Dr. Leah Hollon. Dr. Hollon is probably the most thorough, empathetic, knowledgeable, plugged in doctor I have ever had in my life - I am 73 years old! This is the whole premise behind naturopathic treatment. The entire person (physical, mental, emotional) is treated rather than just throwing prescriptions at symptoms.

I would like to address criteria #1 as well as #2 for the purpose of this letter. More people than ever before are now turning to naturopathic medicine. It offers the patient a much needed alternative to standard western medical practices. Western medicine certainly will always have a prominent place in the healthcare of Virginia residents, but naturopathic practitioners go well beyond in their search for answers than what most western doctors are willing or able to do.

It is imperative that naturopathic doctors be licensed in the state of Virginia so that the residents have a clear choice for their healthcare needs without worrying whether or not their caregiver is properly trained and licensed.

I think the paragraphs above adequately address criteria #2 as well as #1. The specialized skills and expertise of a naturopathic doctor are a welcome and necessary addition to healthcare in the state of Virginia. Naturopathic doctors must be allowed to perform physical exams, order labs, and execute any number of procedures with full licensure in Virginia.

Sincerely,  
Linda Terry

Sent from my iPad

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When moving to Virginia from California, I struggled for months to re-establish my healthcare. This caused my health to decline because I had to not only find a new ND, but also had to find the relevant doctor to do updated testing and lab work. As you know because NDs are not licensed in Virginia they cannot do physical exams or do lab testing. But in California like other states, NDs can order labs and issue prescriptions so this came as a shock to me that it was so complicated here in Virginia. I had to locate a new endocrinologist, PCP, gynecologist, and rheumatologist before I could even just figure out where my health stood. My naturopathic doctor helped refer me to these specialists so that I could be assessed and monitored. But this took months to get the appointments, testing done from them, and then have my labs returned. Of course, I had to find doctors that would also work with my more holistic treatment of my health conditions which added to the frustration. This, along with the move, set me back 6 months in my recovery and could have easily been avoided if my naturopathic doctor had been allowed to perform to the scope of their training. They could have assisted with my medications, or at least ordering labwork to be able to adjust care where it was needed. It is imperative that NDs are able to order testing at a minimum for their patients as well as physical exams. The complication of getting a western medical doctor to understand why you (or your ND) want a certain test should not be in the way of getting effective care in a timely manner. This delays care and increases suffering for Virginians.

This leads to the third issue that people like me face with their healthcare. The cost. Not only do we have to pay out of pocket for a doctor who is trained holistically (as insurance does not cover), but we have to pay the costs of appointments and testing with our western medical doctors as well here in Virginia. This places even more of a financial burden that a person with multiple chronic conditions already faces. It is unnecessary, and in my opinion, discriminatory. Why should I have to face increased costs for the only care that is helping me? Not a single western medical doctor has prescribed, offered opinions, or diagnoses that have helped me. None. The tens of thousands of dollars that I (and my elderly parents) have had to pay to work to get me better was wasted on procedures, tests, exams, radiology, etc that ultimately did nothing. Licensing naturopathic doctors lowers the costs because they are the experts in provide preventative medicine. Additionally, licensing naturopathic doctors is the first step to possible insurance coverage as is in other states.

I am pleading for your attention to this matter and to bring true holistic and preventive medicine in Virginia into 2020. Not everyone can benefit from western medicine and the importance of licensing and permitting NDs to perform exams and testing would be a game changer. My ND, has done more to help me both financially and health-wise than any western medicine doctor has in the last 7 years. Please pass legislation for licensure for NDs in the State of Virginia.

Respectfully yours,

Beth L LaGrant  
4904 Old Main Street  
Henrico VA 23231  
(804) 577-0002 cell

From: **Ellen Ross** <[ellenross20@gmail.com](mailto:ellenross20@gmail.com)>  
Date: Sat, Aug 8, 2020 at 4:50 PM  
Subject: letter  
To: <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

Here is my letter

Thanks so much,  
Ellen Ross

Dear Dr. Elizabeth Carter,

My name is Ellen Ross and I live in Virginia. I was born and raised here and have been in Virginia for 46 years. I have been seeing naturopathic doctors for nearly 20 years for myself and my family. I was fortunate to find a naturopathic doctor, as I was experiencing many health conditions. I had many years of infertility and have suffered with autoimmune problems ever since I was about 34 years of age. I wanted to find a doctor that would not just treat my symptoms. I needed a doctor to look at my whole body (mind, body, and spirit connection) and also dig into my background. I come from a long line of women in my family having fertility issues along with autoimmune problems. I had seen many medical doctors for my health issues and was not receiving any concrete answers as to why I was feeling the way I was feeling. I was miserable because I knew that something was wrong, but no doctor could pin point a problem. I was desperate to find someone to help me. Once I established care, my naturopathic doctor had the ability to help me due to my unique situation and take care of me as a whole person. Naturopathic doctors have a special ability to put many pieces of the puzzle together — they have specialized skills and training that allows them to see a fuller picture. This is what makes them different from other providers. Naturopathic doctors have been able to help me through some very trying medical issues. I have also had years of stomach problems and with time I've gotten much better from dealing with my stomach issues. I'm very grateful for these doctors because they worked tirelessly to find the answers to my medical mysteries and they continue to help me. They work with my other health providers to address the body as it is ever changing and my problems are also changing. More recently, I've had problems with major anxiety and not being able to sleep. My naturopathic doctor went above and behind to pin point my issues and coordinate with my PCP. She is working hand in hand with my PCP to make sure I'm getting the necessary care and proper drug therapy, nutrition and supplements. I am doing better but it was a scary time. Having licensed naturopathic doctors is common sense because they bring a unique skill to the table to look at patients as a whole person and work with those that have not responded to normal therapies in collaboration with the entire medical team.

I also have 4 children now and have taken all of my children to be seen by naturopathic doctors. My son had relentless stomach pains where he was unable able to eat and he had severe anxiety. He wouldn't go to school because he was so anxious which impacted his social well-being. Through supplements and nutritional support we have seen a tremendous improvement. He is eating now and is not anxious and is a completely different child.

I am grateful for the field of naturopathy. I felt stuck and frustrated because I had health struggles that traditional medicine was not able to accommodate. I am so appreciative for this field of medicine

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because I have seen first hand through my own health struggles and the health struggles of my family that there is a way to find relief.

I ask that the Board provide a recommendation for licensure of naturopathic doctors because they provide unique and specialized skills that provide Virginians a way forward towards improved health. Thank you for your time and consideration.

Sincerely,

Ellen Ross

From: **Natalia Tajibnapis** <natalia.tajibnapis@gmail.com>

Date: Sat, Aug 8, 2020 at 6:37 PM

Subject: Letter of Support for NDs licensure in Virginia

To: <elizabeth.carter@dhp.virginia.gov>

To whom it may concern,

Please find attached a letter of support for Naturopathic Doctors Licensure in Virginia.

Sincerely,

Natalia Tajibnapis

August 8, 2020

Dear Members of the Committee,

My name is Natalia, I have been living in the United States and namely in Virginia for 12 years. I have been seeing a naturopathic doctor for about seven years.

I am writing in support of full licensure for medically- trained naturopathic doctors.

Moving to the United States from overseas where I grew up in a small village where my family grows their own food and breathing the freshest air, I experienced multiple physical changes. The change in my diet and my lifestyle caused my body to break down.

Coming from a country where even conventional doctors use traditional methods to cure patients due to inaccessibility to medications and their high cost which many people cannot afford-I was surprised to learn that here in the United States when I had issues that could be fixed with diet, lifestyle changes and supplements the physicians prescribed medications as a remedy and had no grasp of basic alternatives. After seeing many types of conventional specialists for many years without any changes, I had to look for alternatives. The perfect alternative was a naturopathic doctor who analyzes the whole person, takes into account all the aspects of his life and provides an individualized treatment plan.

However, in the process of getting well with the help of a naturopathic doctor, was not without stumbling blocks. Only with my commitment and my belief in the particular doctor, I got my health back and the understanding of the causes that lead to my sicknesses. However, it was time consuming and at a high out of pocket cost, due to lack of insurance coverage (due to lack of licensure of NDs in Virginia). I had to schedule multiple additional appointments with my primary care provider just to get recommended labs (also due to the lack of licensure of NDs in Virginia).

After getting healthy again and gaining my energy, mental clarity and clear skin, I had a lot of people asking me how I achieved it. I recommended them my naturopathic doctor. Even though

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some of my acquaintances are experiencing similar to mine and other health issues that cannot be fixed by consulting a conventional practitioner they are taken aback to see a naturopathic doctor due to the high costs and the fact that they are not licensed.

I urge the Board to recommend full licensure for naturopathic doctors in Virginia. By being fully licensed, people will gain confidence in their knowledge and guidance, and the process will be a lot easier and at a lower expense.

Sincerely,

Natalia Tajibnapis

On Sat, Aug 8, 2020 at 7:59 PM Teresa Smith <ths24101@icloud.com> wrote:

8/8/20

Dear Members of the BHP Committee,

As a Virginia Registered Nurse, I am writing in support of full licensure for medically trained naturopathic doctors.

In this era of chronic disease, many primary healthcare providers are retiring (or moving to other states), and this is increasing the shortage of primary care providers. Medically-trained naturopathic doctors are specifically trained in both conventional approaches and natural medicine and are well equipped to provide medical services. The medically-trained naturopathic doctor can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.

Patients who access care from medically-trained naturopathic doctors expect the same level of regulation and professional accountability as the other regulated health professions in Virginia. Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for patients.

I respectfully urge the Board to recommend full licensure for medically-trained naturopathic doctors in Virginia.

Sincerely,  
Teresa B Smith, RN

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From: Suzanne McWilliams <suzannemcwilliams2@gmail.com>  
Date: Sun, Aug 9, 2020 at 2:22 PM  
Subject: ND licensure public comment  
To: <elizabeth.carter@dhp.virginia.gov>  
Dr. Carter,

Please find the attached letter in support for naturopathic doctor licensure during the public comment period. Thank you for your time and consideration.

Sincerely,  
Suzanne McWilliams

August 8, 2020

To Whom It May Concern:

I want to thank the Board of Health Professions for looking at the possible licensure of naturopathic doctors in Virginia. My name is Suzanne McWilliams and I served as an educator for 40 years in the City of Richmond, Chesterfield County as well as within private education. I have supervised students and other academicians. Education is the primary method of science and discovery where academic standards are imperative to progress.

As an educator, I am keenly aware of the various disciplines that require standardized educational requirements and the importance of accreditation and oversight through the United States Department of Education. I would like to touch on two of the "7 Criteria" adopted by the DHP to assess various providers: Public safety/potential harm and specialty skills.

Licensing naturopathic doctors provides added safety to the public. At this time, there is confusion among consumers, patients and even other medical providers of the term naturopathy but more specifically the differences between medically trained naturopathic doctors and lay naturopaths. These are two distinct and different disciplines and groups of people. They may use similar therapies such as herbal medicine, but they have different training and educational standards. Naturopathic doctors' education is overseen by regional accrediting bodies and individual graduate and medical accrediting bodies that are all recognized by the US Department of Education. But this is not the case for lay naturopaths. The majority of lay naturopaths go through what we may term "diploma mills" and thus their education is not recognized by the United States Department of Education. Medically trained naturopathic doctors also undergo basic science examinations after their second year of education and then complete licensing exams similar to MDs and DOs. Continuing medical education hours are also required for naturopathic doctors in order that they remain current in the field of medicine. None of this is the case for lay naturopaths. Thus, for consumer safety and appropriate understanding to the public at large, licensing naturopathic doctors provides transparency of those that have been trained medically versus those that have received a certificate or correspondence coursework. It is important to have choice but it is responsible

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From: K Olson <kelliolson8388@gmail.com>  
Date: Sun, Aug 9, 2020 at 2:54 PM  
Subject: Naturopathic doctors  
To: <elizabeth.carter@dhp.virginia.gov>

Elizabeth,

Attached is my letter in support of the licensure of NDs in Virginia. Thank you so much!

Kelli Olson

Virginia Department of Health Professionals,

I am writing in support of licensure of naturopathic doctors in the state of Virginia.

In 2012, I was diagnosed with Graves Disease. My endocrinologist informed me that I had a 10% chance of responding to the medication, otherwise I would need my thyroid irradiated. Being only 24 at the time, the prospect of being dependent on hormones and having the many issues resulting from thyroid problems was distressing, so I sought out a trained naturopathic doctor in Virginia. She was confident that my condition could be treated non-invasively, and I have for many years now been officially in remission with completely normal thyroid levels. I have had a healthy pregnancy, which is something that may not have been possible otherwise, and I am grateful for my ND's continued care.

I believe my story addresses several of the key criteria used to evaluate the need for regulation and speaks to the need to license trained naturopathic doctors:

It was the **specialized skills** of my ND, the holistic approach that involved pharmacotherapy, botanical, and nutritional therapies, that my body responded to when traditional medicine proved insufficient.

I strongly feel that the **scope of practice** in Virginia should be broadened for naturopathic doctors so that they can better treat their patients. I consider my ND to be my primary care doctor, and I believe she should be able to perform physical exams and request labs or imaging. When undergoing treatment for my thyroid, it would have been beneficial and convenient for my ND to perform the lab work directly, instead of relying on a separate endocrinologist.

Naturopathic doctors **practice autonomously** in all other states, and I support NDs to operate and regulate independently in Virginia as well.

I have the highest respect for the highly qualified team of NDs that have treated me over the years and I urge you to support them so that they may provide increasingly more effective medical care in the state of Virginia.

Sincerely,  
Kelli Olson

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and ethical to provide transparency of these differences. Licensure is the only vehicle that provides this level of transparency, safety and professionalism.

Licensure for naturopathic doctors should be available because they bring a unique set of skills to the table. They are trained in primary care where they learn physical exams, ordering labs and imaging but they also are experts in botanical medicine, nutrition and pharmaceuticals. This provides a unique set of skills where they can weave together the best of the multiple medicines we have available today and cater it to each person. They also are based deeply versed in prevention. Their goal is to identify imbalances before they become disease.

It is for this reason, that I chose to see a naturopathic doctor – I wanted to remain healthy. At the age 65 years I chose to start training as a triathlete. I had been physically fit throughout my life but after working with my naturopathic doctor, I realized there were imbalances in my life that were there without my full knowledge. My health has further improved due to support from my naturopathic doctor. In fact, my sleep is better, as is my energy and I can focus more clearly on the tasks throughout the day. Even my exercise endurance has improved. I see my naturopathic doctor as part of my medical team and thus they care about all of my regular appointments including ob/gyn and annual exams. They work with my other providers to make sure I am as healthy as possible and to prevent possible setbacks. They are looking out for me and working to keep me healthy now as I just turned 71 years young. We all need someone looking out for us – we want someone being proactive to help us be our best selves.

It is for this reason that I ask for a recommendation from the Board to license naturopathic doctors. I am grateful for all my medical providers that have helped me stay active and healthy and I hope that others may also be afforded the same care I have received. I thank you for your time and consideration.

Sincerely,

Suzanne McWilliams

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On Sun, Aug 9, 2020 at 3:14 PM Rob Anderson <rob@robanderson.com> wrote:  
August 9, 2020

From: **Greg Olson** <golson215@gmail.com>  
Date: Sun, Aug 9, 2020 at 3:00 PM  
Subject: ND regulation and licensing  
To: <elizabeth.carter@dhp.virginia.gov>

Elizabeth,

I have attached my letter in support of naturopathic doctors in Virginia. Thank you!

Greg Olson

Virginia Department of Health Professionals:

I am writing to support the licensure and regulation of Naturopathic Doctors in Virginia.

I have been a patient of a ND practice for a year. Primarily, this is helping treat my elevated blood pressure. Due to natural medicine, I am optimistic about getting my blood pressure completely under control without the need of ongoing medication.

From my experience, I believe that naturopathic doctors meet many of the criteria used for evaluating the need for regulation.

**Specialized skills:** While many of my ND's recommendations overlap with my primary care (exercise, sleep, diet, etc.), their ability to consider the interactions and combinations of more natural nutritional supplements in addition to my current medication is helping me to treat high blood pressure with lower levels of intervention.

**Autonomous practice:** It is my understanding that naturopathic doctors practice autonomously in all other states, and I would desire and support that naturopathic doctors operate and regulate independently in Virginia as well.

**Scope of practice:** I support the scope of naturopathic doctors including physical exams and labs. My treatment would be much easier if my ND could administer their own labs, instead of having to back-and-forth with my primary care.

Sincerely,

Greg Olson

Dear Members of the Committee,

My name is Robert Anderson. I have been a Virginia resident for nearly 30 years and I have been under the care of a naturopathic doctor for almost a year. I am writing in support of full licensure for medically-trained naturopathic doctors.

Prior to working with Dr. Robert Boyd, I had been struggling with a chronic condition and regular infections due to medical issues and related surgeries I underwent shortly after birth. I was referred to Dr. Boyd by my primary care physician because she believed he might be able to help my condition in ways my M.D. and other specialists had not, over the last 50 years. The advice, science-based nutritional and supplementation guidance, and DNA and biome testing I received from Dr. Boyd revealed aspects of my health condition and treatment options that not only reduced my pain and improved my health, but also informed the care I receive from the rest of my medical team. One of my specialists was startled to find that some of the anatomical issues where surgery had recently seemed indicated had entirely reversed themselves, such that no surgery was required.

As a patient who supports licensure for medically-trained naturopathic doctors, here are three concerns I have as it relates to the key criteria.

**1. Risk of harm.** I have come across "traditional" naturopaths who call themselves naturopathic doctors, but who offer advice to clients that is neither scientifically nor medically-based. Without licensure, you are lumping together medically-trained naturopathic doctors who went to medical school with those who may be offering treatments ranging from silly to inadvisable. I was very fortunate to be referred by my PCP to what I think of as a "for real" naturopathic doctor. We need that huge difference to be reflected with formal licensure. For the sake of public safety, we need the same level of professional accountability and standards as the other regulated health professions in Virginia.

**2. Specialized skills.** My naturopathic doctor focuses on my health in an entirely different way than the remainder of my medical team. This is why my PCP referred me to him and coordinates with him, and it's why my specialists at both VHC and Johns Hopkins fully support his treatments. It is crucial that I have someone on my team who is specifically trained in drug-herb and drug-nutrient interactions. This likewise relates to criteria **3, Autonomous practice**, since my other medical providers do not have the same training and knowledge that Dr. Boyd has in both conventional and natural medicine.

I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia, so that other residents of the state may receive the life-changing sort of care I have received, with the safety and confidence that licensure provides.

Best regards,

Robert Anderson  
Alexandria, VA

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From: **Stephanie Pylypko** <spylpko@gmail.com>  
Date: Sun, Aug 9, 2020 at 7:01 PM  
Subject: Letter of support for naturopathic providers  
To: <elizabeth.carter@dhp.virginia.gov>

Hello-

Please find attached my letter of support for licensing of naturopathic physicians in Virginia.

Thanks,

-Dr. Pylypko

medicine and I recognize that they are an essential part to our multidisciplinary approach to patient care. Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the Commonwealth. I urge the board to recommend licensure so that we can better meet the needs of our patients in Virginia.

SINCERELY,  
STEPHANIE PYLYPKO, MD

21785 Filigree Court, Suite 100, Ashburn Virginia 20147

**August 9, 2020**

Dear Members of the Committee:

I am writing this letter in support of licensing Naturopathic Doctors (NDs) in Virginia-specifically bill HB 1040 and SB 858. I am a Family Medicine doctor practicing in Ashburn, Virginia, and I have had the fortunate experience of working with ND's over the last six years. I found them to be very knowledgeable and helpful to patients and I was grateful that they could provide alternative solutions to medical problems for which traditional approaches had failed.

Additionally, while working with ND's I was particularly impressed at their breadth of knowledge regarding the many uses of natural supplements as well as their potential side effects. They ordered the appropriate labs under MD supervision to monitor for adverse reactions and studied the current scientific literature to ensure proper dosing and frequency of supplement regimens. I have found medically trained naturopathic doctors extremely competent at working safely and collaboratively with all medical providers. I was reassured that one of the core tenets to their practice includes the 'Do No Harm' policy which guided them to always err on the side of safety in an emerging field where large randomized control trials are sometimes lacking. I was very touched by their commitment to the overall well-being and health of our shared patients and I looked to them as valuable players on our health care team.

Moreover, I became comfortable referring patients to ND's after learning about their rigorous four-year degree program. The first two years of their education are dedicated to the medical sciences and include courses in biochemistry, anatomy, pathophysiology, and neuroanatomy that are similar in content and length to the courses required for traditional medical doctors. During their second two years they undergo systems and population studies (gynecology, cardiology, gastroenterology, geriatrics, etc.) Throughout their training they focus on the application of natural therapies such as botanical medicine, clinical nutrition, physical medicine and health counseling. Some go on to complete additional training in acupuncture. Additionally, all ND's complete a board exam in basic sciences, and they have the opportunity to complete residencies to further master their practice. They are credentialed by a committee (Council on Naturopathic Medical Education) which is recognized by the US department of Education.

Finally, the licensing of naturopathic doctors would allow them to practice within the full scope of their abilities and would provide an immense service to patients. With the current pandemic, resources are even more limited and trained medical professionals are critical to our public health system. I value the critical role that ND's play in the field of integrative

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On Sun, Aug 9, 2020 at 8:06 PM Manya Kaur <manya.kaur@hotmail.com> wrote:  
August 9, 2020

Dear Members of the Committee,

My name is Manya Kaur, I have been a California resident for 7 years and I have been under the care of a naturopathic doctor for over 1 year. I am writing in support of full licensure for medically-trained naturopathic doctors. The naturopathy has helped me in healing my gut and intestinal issues tremendously. Most importantly, I don't have to worry about any side effects. Also, following naturopathy has opened a wide option of healthy food choices (gluten free, dairy free) that I can incorporate in my diet.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the criteria.

I was surprised how much role simple food choices can play in improving one's health. One doesn't have to solely rely on synthetic medicines to treat or cure any illness. There are multitude of healthy and natural options available but a large number of people don't have access to this knowledge. Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.

Economic impact obviously is a concern for most people, including myself. While the benefits of naturopathy are countless, many can't take the advantage of this knowledge as it is expensive to get consultation with naturopaths. The underlying reason is because naturopaths are not licensed. Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians as well as people from other states need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Manya Kaur

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Dr. Marie Rodriguez  
Naturopathic Physician  
*transform with nature's wisdom*

drmarierodriguez.com  
care@drmarierodriguez.com

August 10, 2020

Dear Members of the Committee

I appreciate your consideration of the important and necessary task of regulating the practice of naturopathic medicine in Virginia through licensure.

My name is Dr. Marie Rodriguez. I am the Vice President of the VAANP, and a native of Fairfax, Virginia. I completed my undergraduate study in Chemistry from the University of Virginia in 1995 and my doctorate in naturopathic medicine from Bastyr University in 2002. While I reside in Arlington, VA, I have been practicing in the District of Columbia since 2004, where I am currently licensed as a naturopathic doctor.

In DC, I am able to order labs, do physical exams, diagnose and treat. I can provide diagnosis and procedure codes that my patients can then use for insurance reimbursement purposes. I have enjoyed a successful solo practice in DC for 16 years, and I have helped thousands in pursuit of improved health. I am proud to be a licensed naturopathic doctor and it has been my honor support my patients in healing from all types of ailments: hypertension, chronic kidney disease, chronic pain, gastrointestinal illness, endocrine disorders, insomnia and immune disorders to name a few.

However, less than 5 miles away, in my home state, I am completely unregulated. I am not able practice to the fullest scope of my training. I cannot order labs, I cannot do physical exam, I cannot diagnose or even treat. All I can do is consult and make suggestions. Because my hands are tied in Virginia, there is no incentive for me to practice in my home state.

Furthermore, at least 10 naturopathic doctors residing in Northern Virginia commute across the border into DC to practice. This does nothing for the local VA economy and will only worsen as our field continues to grow.

Another big concern is that in Virginia, lay naturopaths go by the exact same title as medically-trained naturopathic doctors. The average consumer does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath.

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Licensure, and a regulatory framework, will provide clarity - while also promoting safety and access to patient chosen care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses both the public as well as other health care providers.

Only medically-trained naturopathic doctors should be allowed to use the title 'naturopathic doctor'. Anyone calling themselves 'doctor' must have medical education and training. Because medically-trained professionals by definition pose potential harm, they need a regulatory board to ensure safety.

It is also important to note the specialized and unique skillset that naturopathic doctors provide to the health care system. We offer a hybrid of western medical assessment and natural, non-invasive therapies that are not found in any field of health. Because we offer individualized care, we are capable of meeting the needs of a sector of the population who are not helped by standard allopathic practice. I see patients who are too sensitive to take medications, those who are unable to recover fully from surgery, those who want to experience a greater level of health than what conventional medicine can offer, and those who have been told that there is nothing wrong with them since their labs are normal.

Virginia is experiencing a shortage of gatekeeper providers, and naturopathic doctors are ready to fill in the gap. Because we are experts in preventing long term, chronic degenerative conditions, we fill an important void in the health system and we have the potential to not only save vast amounts of money, but to greatly improve the health of the constituents of Virginia.

I strongly urge the Board to license naturopathic doctors in the Commonwealth of Virginia.

Thank you,

Marie Rodriguez, ND

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From: jrw <jw\_travelarch18@gmail.com>  
Date: Sun, Aug 9, 2020 at 8:58 PM  
Subject: Support of Licensure of Naturopathic Doctors  
To: <elizabeth.carter@dhp.virginia.gov>  
Cc: <nicole.lyne@richmondnaturalmed.com>  
Ms. Carter,

Please see the attached letter describing my personal interactions with independent naturopathic doctors and my strong support of their efforts to obtain licensure. These are highly trained and competent professionals who provide alternative therapies to conventional medicine, reduce the dependence on pharmaceutical therapies, and demonstrate trust and confidence with their patients.

Thank you for your time.

Best regards,  
Jeffrey Weiseman

August 9, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors. My name is Jeffrey Weiseman, and I have been under the care of independent naturopathic doctors for just under two years. I am a type 1 diabetic with asymmetric psoriatic arthritis for over fifteen (15) years and I also developed gastrointestinal issues around May 2019 which precipitated symptoms akin to ulcerative colitis. After years of traditional NSAID therapy for my arthritic pain, I engaged a naturopathic doctor and began to implement turmeric supplements as an alternative to long-duration use of NSAIDs. I experienced a very quick response to this supplement therapy which resulted in the alleviation of my pain. Due to the success of this alternative therapy, I no longer require NSAIDs to manage my discomfort.

For my gastrointestinal issues, I consulted both a local endoscopist as part of my routine endoscopy and a naturopathic doctor regarding my gastrointestinal issues. As an alternate to conventional pharmaceutical therapy suggested by my endoscopist, I was prescribed probiotic supplements and a food allergy test by my naturopathic doctor. The food allergy test pinpointed several dietary conflicts for which a food strategy was developed to compliment the probiotic therapy. After only six (6) weeks of compliance to the diet restrictions my gastrointestinal issues have been effectively eliminated, although I will continue the dietary guidance for its duration as directed.

The standard of care demonstrated by my naturopathic doctors and their ability and willingness to work in conjunction with my traditional medical care gives unequivocally supports that naturopathic doctors are specifically trained and competent in preventative work aimed at restoring health.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Jeffrey R Weiseman  
3004 W Leigh St  
Richmond, VA 23230

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From: Kimberly Villar-Weiseman <kvw82117@gmail.com>  
Date: Sun, Aug 9, 2020 at 9:23 PM  
Subject: Support of Licensure of Naturopathic Doctors  
To: <elizabeth.carter@dhp.virginia.gov>  
Cc: <nicole.lyne@richmondnaturalmed.com>  
Ms. Carter,

Please find the attached letter describing my experience and support for the licensure of Naturopathic Doctors.

Sincerely,

Kim Villar-Weiseman

August 3, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors. My name is Kimberly Villar-Weiseman, and I have been a practicing registered nurse for over 14 years. Approximately seven years ago I was told I needed a hysterectomy to resolve difficulty with ongoing menorrhagia and uterine fibroids. I visited a naturopathic physician in Blacksburg, Virginia for a second opinion. Through a combination of supplements and dietary changes my bleeding issues greatly improved and I canceled my hysterectomy. I have worked with other naturopathic physicians in the following years and have always been very happy with my treatment. I have found medically-trained naturopathic doctors extremely competent at working safely and collaboratively with all medical providers. Naturopathic doctors are specifically trained in preventative work aimed at restoring health.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while almost promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account

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by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.

- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.
- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.

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- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors -- titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Kimberly Villar-Weiseman

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From: **Marisa Schmader** <marisa.schmader@gmail.com>  
Date: Sun, Aug 9, 2020 at 10:20 PM  
Subject: Support for HB 1040/SB 858 (licensure for medically-trained Naturopathic Doctors)  
To: <elizabeth.carter@dhp.virginia.gov>

Please find enclosed a letter in support of HB 1040/SB 858 (licensure for medically-trained Naturopathic Doctors).

Best,

Marisa Schmader

August 5, 2020

Dear Members of the Committee,

My name is Marisa Schmader, I have been a Virginia resident for 17 years and I have been under the care of a naturopathic doctor for over 5 months. I am writing in support of full licensure for medically-trained naturopathic doctors. I have been seeing naturopathic doctors to assist with my infertility and have greatly increased the quality of my life in a very short period of time. They have taken the time to truly try and understand my health and any underlying issues that impact my ability to have a biological baby. Having access to this type of care is vital to addressing the health needs that often get overlooked by traditional western medicine.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**Risk of harm.** (There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctor. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia). Virginia should elevate it's standard of protection and support for its residents to ensure the safety, security and health of its citizens.

**Specialized skills.** (Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.) This is a huge gap in the healthcare system today. If

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From: **Shelly Clevidence** <stc4469@yahoo.com>  
Date: Mon, Aug 10, 2020 at 7:33 AM  
Subject: Letter of Support for Naturopathic Licensure  
To: elizabeth.carter@dhp.virginia.gov <elizabeth.carter@dhp.virginia.gov>

Dear Ms Carter,  
Thank you for bringing my letter to the committee.  
Be well,  
Shelly Clevidence, ND

August 10, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Shelly Clevidence, and I have been a naturopathic doctor for over fourteen years. I am writing in support of full licensing for medically-trained naturopathic doctors.

As you know, medically trained naturopathic doctors are distinct as a group of providers. As a graduate from the National University of Naturopathic Medicine I took the same basic classes as a traditional medical student. As a licensed naturopathic physician (I hold my license in Vermont) I have completed a national board exam in basic medical sciences, pharmacology, nutrition, botanical and physical medicines. I also complete yearly continuing education to maintain my license.

When I practiced as a primary health care provider in Oregon I was able to provide care for patients and get reimbursed by Blue Cross Blue Shield and other insurance plans. Because I had my own practice I was able to spend the time I needed with patients to answer their questions in a thorough manner. This greatly increases patient compliance and also a patient's sense of responsibility toward their own health. When we understand the reasoning behind our physiology and the treatments we use, we can engage and support our bodies more effectively.

When I moved to Virginia Beach I was able to support people's health through education on how our bodies work and suggesting nutrition, diet and lifestyle changes. I definitely have helped people here. However, not being able to order lab work, diagnose illnesses or prescribe treatments has greatly impacted my ability to track their progress and help them. I am trained in giving annual exams, performing minor surgeries, performing intravenous and intramuscular injections to name a few of my skills. I haven't done minor surgeries since finishing medical school but I had been supporting healing using IV therapies when I worked in Oregon. I miss being able to take a thorough physical exam and share and explain my findings. Of course my greatest hurdle in being able to help people obtain optimal health in Virginia is the fact

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more Americans were to approach their healthcare by considering their entire person, their health and welfare would significantly improve. This type of healthcare support would not only save lives, but save money.

**Scope of practice.** (Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. From the patient perspective this creates an added burden - as patients need to then schedule an additional appointment with their primary care provider in order to access labs and basic medications. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services -- including prescriptions, such as basic antibiotics and anti-hypertensives. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.) It is unclear why Virginia would want to limit the impact these doctors can create in the marketplace. Allowing naturopathic doctors the ability to practice in this manner would ease the burden on an already overtaxed healthcare system.

In closing, **I strongly urge the Board to recommend licensure for medically-trained naturopathic doctors.**

Sincerely,

Marisa Schmader

that I am not licensed. I have a clear understanding of what is needed to be a competent and effective health care provider but without licensure I have struggled with the frustration of only being able to provide the expertise of a health coach.

I have worked with military clients here in Virginia Beach. They are familiar with naturopathic medicine from being stationed in Washington state and other states where our profession is licensed. They typically are expecting a practitioner who has graduated from a CNME accredited naturopathic medicine program. Unfortunately, the Virginia BHP registration process doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors. There is a lay naturopath who practices in Virginia Beach and advertises that she is a naturopathic doctor. I think this is confusing for the consumer and damaging to my medically trained and accredited naturopathic profession.

I believe licensed naturopathic doctors are needed in Virginia, especially in this critical time of provider shortages. We could serve as additional providers to help deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. One example of where naturopathic doctors can shine in this state today is with Covid-19. The majority of our nation is overweight or obese. Covid-19 impacts overweight, obese and diabetic people more severely than healthier people. We are excellent in our training in health optimization and maintenance. We are well trained in prevention and patient education. During this pandemic is the best time to lean in and find effective ways to decrease stress, shed excess weight, reverse metabolic syndromes and optimize our immune systems. A compassionate, patient and skilled health care provider can be instrumental in providing the support and guidance required. Naturopathic doctors provide these skills.

I respectfully urge the Board to recommend licensure so that medically-trained naturopathic doctors can become licensed and provide additional, safe healthcare access for the state of Virginia.

Sincerely,  
Shelly Clevidence, ND

2244 Walke Street  
Virginia Beach, VA 23451

757 727 3728

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From: Anita Garland <agarland@hsc.edu>  
Date: Mon, Aug 10, 2020 at 8:38 AM  
Subject: Licensure of Naturopathic Doctors - Letter of Support  
To: elizabeth.carter@dhp.virginia.gov <elizabeth.carter@dhp.virginia.gov>

8 August 2020

Dr. Elizabeth A. Carter  
Executive Director  
Virginia Board of Health Professions

Dear Dr. Carter,

I am writing in support of the licensure of Naturopathic doctors. I appreciate the opportunity to do so.

I have been under the care of a naturopathic doctor for two years. I went to her practice after having been ill with an upper respiratory problem for three months, having seen allopathic doctors throughout that time, having been prescribed drugs and other therapies, but having received no relief from my symptoms. I felt that my doctors had given me their best efforts, so I wanted to pursue another avenue.

That pursuit led me to naturopathic medicine. Following the treatment plan of a naturopathic doctor, I was healed of that respiratory problem in a few weeks. I have continued to see that doctor for my general well-being since that time. I am a strong proponent of the work my doctor and the doctors in her practice do.

Let me also state that I believe in the value of allopathic medicine and the extraordinary merit—even the great miracles—of pharmaceutical drugs, yet I do not believe that they are the only way that healing can occur. The knowledge of that and the doctors who espouse it need to become more widespread and available in Virginia.

For your purposes, then, I would like to address three of the seven points for licensure of NDs, using my personal experience with my naturopathic doctor as an example.

1. **Specialized skills.** Prior to my initial meeting with the naturopathic doctor, I filled out a 10-page questionnaire required by her practice detailing my medical history, while also giving reflections on my life and well-being. Then, in the first hour of my two-hour meeting with her, she listened—really listened—as I described other aspects of my life and health. She had a comprehensive view of my health like no other medical professional.

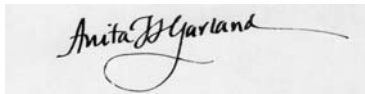
It was during the second half of our meeting that I found my naturopathic doctor's insight to be extraordinary. She evaluated where I was in my health, why my illness could have persisted as long as it did, what I needed to change to bring my body into balance, and how I might make those changes. She then gave me an extensive

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I could write a great deal more about my experience with this exceptional N.D.—from detailing the oasis of serenity in her office, which takes you to the happiest of places in your mind, to the friendliness and professionalism her staff, which make you feel better just walking in the door—but I am sure you have many other letters to read. I hope my brief descriptions above give support to your study.

I see licensing Naturopathic Doctors as only a win-win for the medical profession and for the citizens of our great Commonwealth. I hope that the Commission and the General Assembly agree. Their approval would be the greatest medical benefit that the people of Virginia could receive.

Sincerely yours,



Anita H. Garland  
Cell: 434-390-2191, Home: 434-223-8791  
P. O. Box 277, 143 College Road  
Hamden-Sydney, VA 23943

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Personalized Care Plan, which included supportive therapies (vitamins and supplements) along with self-care and lifestyle suggestions.

I was astounded. I had never had a doctor listen to me in the same way, or take such a holistic approach to my health. This is not to demean the hard-working doctors I have, whose time per patient is tightly-regulated, but rather to *proffer that the value of naturopathic medicine can extend beyond the purview of what may be possible by allopathic medicine and enhance it.*

2. **Scope of practice.** At our initial meeting, my naturopathic doctor wanted to evaluate past and present results from my laboratory testing with my other physicians. However, since she could not order those tests, I had to request them from my allopathic doctor, which took time from that doctor for a perfunctory request. That was regrettable and further extended the length of time between appointment and outcomes.

My naturopathic doctor, like any allopathic doctor, was able to come to conclusions regarding my care by listening to the description of my symptoms. She recommended supportive therapies to aid in my recovery. If she had had more flexibility in the scope of her care, she could have given me an appropriate physical exam and, if warranted, prescribed pharmaceutical drugs.

*The breadth of the medical service that an N.D. is qualified to provide through their training and education is hampered by the current restrictions on their practice. Licensing would allow them the opportunity to more comprehensively treat those under their care.*

3. **Economic impact.** The burden on our current medical establishment is overwhelming. I do not know how the profession is holding up, especially given the added weight of the COVID crisis.

To give you one example—last year I was having another medical issue for which I saw my naturopathic doctor. She suggested that I see a specialist in that field. However, my naturopathic doctor could not be the referring doctor for a specialist, so I went to my allopathic doctor, who examined me, and then referred me to the specialist. (So, two appointments instead of one.) I called the specialist's office in October 2019. I was not able to get an appointment until the following May 2020. Due to this lag in time, my naturopathic doctor was proactive in helping me with my symptoms with supportive therapies. She was working with the best tools she had, given limited resources because of the lack of licensing. Thankfully, within a few months my symptoms began abating. By the time I went to the specialist, my symptoms were slight. His advice was, "Continue what you are doing." So, I have continued my supplements and my treatment through my naturopathic doctor, which are keeping me stable.

Fortunately, I was in the financial position to receive—and had the knowledge to seek—medical advice from another doctor outside traditional medicine. That doctor was able to treat me and to find a resolution for me, and I was able to pay her. I am not quite sure what I would have done with this medical condition for 7 months until the specialist could see me had I not had my naturopathic doctor. The worry alone would have cost me a great deal of mental stress. Too, the condition may have gotten even worse than it was.

*All others need to be aware of and have the same opportunity that I have had to receive this level of care from a licensed professional.*

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On Fri, Aug 7, 2020 at 4:31 PM Sarah Sutton <sarah@truceinc.com> wrote:

August 3, 2020

Dear Members of the Committee,

My name is Sarah Sutton, I have been a Virginia resident for 17 years and I have been under the care of a naturopathic doctor for over 15 years. I am writing in support of full licensure for medically-trained naturopathic doctors. I have worked with several NDs over the years and each has been pivotal in my navigating several health challenges—from unexplained weight gain, depression, anxiety, adrenal issues, thyroid issues, and most recently, hormone and glucose metabolism irregularities. I have not only improved my health, every time I have learned an incredible amount of new health info I can apply moving forward.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**Specialized skills:** Naturopathic doctors consider the patient's health holistically and really work from a place of discovering the underlying causes and how they are related, and not just wanting to medicate. In my experience, they have always worked with my family doctor in bridging the gap in care, and in fact, my doctors have always relied on their additional expertise.

**Scope of practice and economic impact.** Many times I have wanted to see just my ND, but was required to see an additional doctor, since certain tests, etc require that authorization. This is a time and money burden for me personally, and overall reduces access of other patients. Licensing would also pave the road to insurance coverage, which would further ease the overall economic burden for many.

I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Sarah Sutton

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From: **Parke Sterling** <parkesterling83@gmail.com>  
Date: Fri, Aug 7, 2020 at 4:44 PM  
Subject: In Support Naturopathic Doctors  
To: <elizabeth.carter@dhp.virginia.gov>

8/7/20

Ms. Elizabeth Carter  
Department of Health Professions  
9960 Mayland Dr suite 300  
Richmond, VA 23233

Dear Ms. Carter,

I am writing to convey to you my experience with Dr. Hollon of Richmond Natural Medicine. I feel grateful to have found a practice that has providers that are educated in both the conventional medical model and Naturopathic Medicine. To boot, Dr. Hollon is likable, relatable and has the ability to relay medical concepts to lay people so that they can understand it better. That has been my experience in the 8 months that I have been a patient at Richmond Natural Medicine.

I started seeing Dr. Hollon because I was getting almost no relief from the anxiety, sleep issues and digestive troubles that I was experiencing for about a decade. I was told by numerous primary care doctors in the 15 minutes that they allotted me, to take an SSRI, not watch screens at night and take more laxatives. Needless to say, these "interventions" did nothing to address the root of my issues. Finally, I decided to schedule an intake session with Richmond Natural Medicine. After our two-hour intake, I was blown away. We reviewed family history, chronicled the symptoms I was experiencing, reviewed diet and lifestyle habits extensively and Dr. Hollon thoroughly explained blood work that a conventional doctor had previously order, but had never taken the time to explain to me.

As Primary Care Doctors become increasingly overwhelmed, the amount of time that is allotted for each visit and the quality of the attention given to each patient is diminishing in my opinion. Richmond Natural Medicine takes the polar opposite approach.

Richmond Natural Medicine and other Naturopathic Doctors are not a luxury. They are a necessity. They fulfill a need that is expanding by the day in our society. The mind and body are not disconnected, as we all know by now. The dividing line between the two is completely arbitrary, just as the dividing line between "human" and "nature" is completely arbitrary. Naturopathic doctors take this into account and it is often the missing link in addressing lifelong symptoms that some of us experience.

Physical exams, imaging, labs, these all should be at the disposal of Naturopathic doctors. Coverage for those that cannot afford it could change the quality of life for countless people.

Please utilize any influence that you have to help these practices do their work more effectively and effectively. Encourage your colleagues to do the same. Your actions will make a difference.

I wrote this letter because I feel this strongly about this issue. Feel free to reach out to me with any questions or concerns.

Regards,  
Parke Sterling  
804-980-5266

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From: **Hokie Girl** <hokiegirl1974@gmail.com>  
Date: Mon, Aug 10, 2020 at 10:58 AM  
Subject: Support for Licensing/Regulating Naturopathic Doctors in Virginia  
To: <elizabeth.carter@dhp.virginia.gov>

Dear Ms. Carter,

I am writing to share my support to license and regulate naturopathic doctors who meet the applicable criteria in Virginia.

While my experience may be solely limited to my personal care with my naturopathic doctors, the impact on my life has been profound. So much so that I have encouraged loved ones, friends, colleagues, my hairdresser, and even people I've met while running errands to make an appointment with her.

My personal journey with my naturopathic doctor began in 2013 in the months following the loss of my mom. I sought naturopathic care because conventional medicine wasn't working for my depression. I felt defeated. After my first appointment with my naturopathic doctors, however, I left feeling full of hope and promise for my future. I realized that I was exactly where I needed to be. In the months and years that have followed, her wisdom has supported me through a cancer diagnosis, thyroid and hormone issues, trauma, and indescribable loss. The scope of her healing has gone far beyond natural pharmacology. Never have I been to a more thoughtful, compassionate, knowledgeable doctor, nor have I ever felt so genuinely cared about by a medical professional. My only regret is that I didn't seek a naturopathic doctor's services sooner so that my mom, who suffered from severe fibromyalgia, could have benefited from her naturopathic, whole body approach to wellness. It may be too late to help my mom, but I am taking the opportunity to voice my support so that people with chronic illnesses who are forced to live in a fog of opioids and other narcotics could be one step closer to gaining access to alternative means of pain management.

Additionally, with the current pandemic and primary care physician shortages across the Commonwealth, it is more important than ever to embrace the opportunity to have more doctors. We also live in an area that is heavily saturated by military families and individuals relocating to Virginia from states with already licensed naturopathic doctors. Thereby, it's imperative to discern bona fide naturopathic doctors from lay healers, consultants, etc. to alleviate confusion and minimize the risk of harm.

Naturopathic medicine and the knowledge, training, and skills of my naturopathic doctor have changed my life for the better. It is without hesitation that I wholeheartedly support the licensure and regulation of Virginia's naturopathic doctors so that others may benefit the way I have.

Thank you for your time and consideration in this very important endeavor.

Kindly,  
Adrea Miller 727.593.6352

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From: David Surette <djsurette@gmail.com>  
Date: Mon, Aug 10, 2020 at 11:16 AM  
Subject: Fwd: Letter for Naturopaths  
To: <elizabeth.carter@dhp.virginia.gov>

Department of Health Professions  
9960 Mayland Drive, suite 300  
Henrico, VA 23233

Mr. David E. Brown, D.C.

Dear Dr. Brown,

My wife and I would like for you and the Department of Health Professions to know our stance on the reasons we want and must have Naturopathic Doctors (ND's) to be licensed in the State of Virginia:

1. We have been seeing for over 35 years alternative medical professionals in multiple States for our basic health care. We have seen licensed and unlicensed professionals. In our experience, and in every case in other states (excluding our Naturopath in Virginia), where the caregiver was unlicensed, we received expensive and poor health care. In every case, in other states where the caregiver was licensed, we received outstanding and reasonable costing health care. Having licensed professionals, it is a known for people who are not able or do not have the time to do a lot of research before needing to see a healthcare professional. Licensed professionals are MD's, CPA's, Investment Bankers, etc. So must Naturopathic Doctors be licensed since they help on the most important thing our health!
2. It is important to us that we know when we are working with an ND, that they are specialized in the skills we are looking for to care for specific health issues. Having trained professionals that are ND's in specialized areas and skills and are licensed in those areas, we as residents of the State of Virginia can count on that license of those specialized skills. Otherwise we are looking in the darkness of multiples of unlicensed people who say they can help, but can cause harm. In the past this has cost us unnecessary expenditures, time and our faith in Naturopathic Doctors. When we found our Naturopathic Doctor here in Virginia, we did an extensive search on her credentials, testimonies and affiliations. Because she attended one of the top two Naturopathic Schools and studied for as many years as a medical doctor, we felt confident in choosing her. These are the type of doctors we want, and licensing will give them the credibility they worked hard for and deserve.
3. It is also extremely important that these licensed ND's have a Scope of Practice that includes the ability to run labs and exams like other Medical Doctors (MD's). Since they will be our caregiver then they will know which labs specifically need to be done. We will, therefore, not be subject to expensive unnecessary labs or exams by MD's, that work against us because they either do not believe us or are unwilling to provide labs or exams for our special health care needs. For example, our Naturopath in Connecticut (a licensed state) was able to order lab work that was specific to us and our health issues saving us money and time by not having to visit another doctor for lab work. But our naturopathic doctor in Virginia cannot order the same labs for us if needed.
4. For us to be given professional, substantial and best of health care, with reasonable economic impact on us, we will need to have the ND's be integrated into the Healthcare System. Meaning they will need to be able to not only be searched online,

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by people like me and my wife, but also be covered by our individual Health Insurers. Much of our lab work that was ordered by licensed Naturopaths was covered by our insurance.

These items are most important for us to be healthy human beings in the State of Virginia.  
Best and Kindest Regards,

David J. Surette 8/10/20  
Karen L. Surette 8/10/20

On Mon, Aug 10, 2020 at 12:46 PM Parker, Alethea <aparker@artcraftcompanies.com> wrote:  
To Whom It May Concern:

This letter is written in support of two bills for GA 2020 (SB858/HB1040). As a citizen of the Commonwealth of Virginia, and someone who has faced difficult health challenges, I believe that it is important to provide licensure for Naturopathic Doctors with the necessary medical training to provide a necessary level of health care to all Virginians.

There currently exists a Risk of Harm for those people searching for alternative answers to medical challenges. I personally spent more than seventeen years attempting to identify the cause of different medical conditions. Prescription medicine would give some relief, but they then affected my body in other ways. After multiple failed therapies, I was told by doctors that there was no known cause for my condition and that I would have to live with the issues. I searched for alternative medicines but had no idea how to know if those advertising their services were really trained or if they simply read a book and decided to try to help others.

I did a lot of research before finding a Naturopathic Doctor who had the medical training and years of experience to help me. We were able to identify environmental and food issues that were affecting me and adjust my treatments, in tandem with my primary care physician in order to find the answers. It has now been more than two years since I have had to take the prescription drugs to help me live with my condition. My concern is that if I had called one of the many people trying to provide holistic medical advice without being properly trained and licensed, I may not have found the answers that I need. In fact, I might have been harmed.

I have encouraged others who face the same frustrations with mysterious illnesses or those simply trying to lead a lifestyle to prevent illness instead of treating it after the fact. Many of them have been confused by the number of people out there in the community and on social media claiming that they can help. Of course, I recommend my doctor if they live nearby, but every time I speak to someone they reply that the Economic Impact for them is just too much. Naturopathic medicine is simply not an option for them due to the fact that in Virginia these services are not covered.

Actually, my brother and his wife wanted to relocate to Virginia after receiving an exciting job offer from an employer in the state. However, my sister-in-law is currently receiving health care from a Naturopathic Doctor in Connecticut. One of the biggest factors in them not accepting the job was because the Naturopathic Doctors here in the Commonwealth are not currently licensed. She was very surprised to learn this and they decided that they would not choose to live in Virginia. Decisions like this have to affect the economy of the Commonwealth of Virginia.

Thank you for allowing me to express my concerns during the time of Public Comment on these two bills.

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Sincerely,

**Alethea M. Parker**  
President  
Artcraft Management, Inc.

The Artcraft Companies  
4447 Cox Road  
Glen Allen, VA 23060-3326  
Phone: 804-433-1011  
Email: [aparker@artcraftcompanies.com](mailto:aparker@artcraftcompanies.com)  
Website: [www.artcraftmanagement.com](http://www.artcraftmanagement.com)

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August 10, 2020



Federation of  
Naturopathic Medicine  
Regulatory Authorities

**Letter of Support for  
Regulation of the Practice of  
Naturopathic Medicine in Virginia**

Dear Members of the Committee,

August 7, 2020

My name is Beverly Sheffield. I was born in Virginia and have lived in the Commonwealth all my 51 years. I have been under the care of a Naturopathic Doctor for over 6 years. I am writing in support of full licensure for medically trained Naturopathic Doctors because my ND saved my life. She advised my then new MD on certain tests to run and discovered underlying causes that my previous MD had missed for years. She truly listened to me. She was the only doctor who did. My ND was my second opinion doctor that so many MD advise us to get.

Dear Members of the Virginia Board of Health Professions Regulatory Research Committee,

Below are two specific reasons why, as a patient, I am in full support of licensure for Naturopathic Doctors in Virginia.

The Federation of Naturopathic Medicine Regulatory Authorities (FNMRA) supports regulation of naturopathic medicine in Virginia. Regulation is integral to the promotion of safe naturopathic medical practice and protection of the public.

**Specialized skills:** Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As Naturopathic doctors are both extensively trained in both conventional approaches and natural medicine, they help to bridge the gap that exists between conventional and traditional medicine practice. This specialized skill benefits me as a patient. It allows me to discuss what drug options are most beneficial to treat my condition and provides me with confidence that I am doing what is best for my body.

The FNMRA's mission is to protect the public by connecting regulatory authorities and promoting standards of excellence in the regulation of naturopathic medicine. The Federation supports new and existing regulatory organizations in fulfilling their statutory obligations to regulate the profession in the interest of public protection. The FNMRA envisions a coordinated regulatory system for naturopathic medicine throughout the United States.

**Economic impact:** Licensure of medically trained Naturopathic Doctors would reduce the burden on our existing system by creating additional access for patients. Licensure would also pave the road to insurance coverage which would provide an additional option for patients to get treated. Currently, medically trained Naturopathic Doctors are unable to use proper coding that would enable insurance coverage. As chronic diseases continue to rise, this burden and the impact fall disproportionately to the medically underserved especially considering many primary care providers are retiring thus creating a shortage of physicians. As a lifelong Virginian, we need increased access to preventative healthcare services that medically trained Naturopathic Doctors are more than capable of providing.

The FNMRA appreciates this opportunity to illustrate the need for licensure of qualified naturopathic doctors (NDs) in Virginia. NDs who have graduated from a CNME-accredited naturopathic medicine program have been trained to be primary care providers. When they have passed competency-based national naturopathic licensing examinations, they have demonstrated that they are competent to safely and effectively use naturopathic medicine to treat disease and optimize health.

Licensure of medically trained Naturopathic Doctors will provide additional, safe healthcare access for patients of all walks of life. I respectfully urge the Board to recommend full licensure of Naturopathic Doctors in Virginia.

**Risk of Harm to Consumers:**

The Virginia BHP has identified seven criteria to evaluate if a health profession requires licensure. The FNMRA will address the primary criterion of Risk of Harm to the Consumer.

Thank you for your time.

Naturopathic doctors have been regulated for decades in many states for the purpose of public protection. This protection is provided by the use of proper title (naturopathic doctor), by excluding unqualified persons from practicing naturopathic medicine, and by creating a structure through which the public can report complaints and subsequently both licensees and lay practitioners can be investigated.

Sincerely,

Beverly Sheffield  
Leesburg, Virginia

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9220 SW Barbur Blvd., Suite 119, #321 • Portland, Oregon 97219 • phone: 503-244-7189 • fax: 503-452-3943 • info@fnmra.org • **103**fnmra.org

**Risk of Harm to Consumers: (cont.)**

- **Regulation of naturopathic doctors provides consumer protections against harmful behavior**

Risk of Harm can be objectively demonstrated by the number of disciplinary actions taken against licensed NDs in currently regulated states. Naturopathic doctors have fewer disciplinary actions taken against them compared to MDs and DOs (see addendum A). Anytime a consumer enters into a doctor-patient relationship, there is an inherent power imbalance that places the patient at risk of harm. Regulation helps to minimize the risk of harm

The FNMRA has tallied the number of disciplinary actions taken the U.S. against licensed naturopathic doctors from 2010 to August 2020 (see Addendum B). The disciplinary actions are grouped by type. For example, "Physician acts that (directly) harm patients physically or emotionally". This category includes sexual boundary violations. It is essential for a regulatory structure to be in place so that patients can file complaints of sexual violations. Although disciplinary actions of this type are rare, in the last 10 years there has been only 12 licensed NDs disciplined for sexual boundary violations, out of an estimated 6,000 active licensees (0.2 % of licensed NDs). This is consistent with the percentage of sexual boundary violations by MDs.<sup>1</sup>

Sexual boundary violations are a type of harm to the public that requires a response from regulators. Consumer protection agencies and attorneys general are not equipped to handle these types of complaints, whereas the Board of Health Professions is experienced and has policies and procedures in place to investigate these types of complaints. Licensure of naturopathic doctors will provide the citizens of Virginia with a way to have this type of harm addressed and prevented.

- **Regulation provides consumer protection against lay naturopaths**

Naturopathic regulatory authorities consistently report to the FNMRA that there are many more consumer complaints against lay naturopaths than licensed naturopathic doctors. It is difficult to track this number, but we have a few examples. In 2013 in California, 6 actions were taken against licensed NDs and 51 were taken against lay naturopaths. In the past ten years in Utah, there has been one disciplinary action taken against a licensed ND and an average of one action taken per year against lay naturopaths. Lay naturopaths, because of their lack of training, can recommend dangerous or ineffectual treatments, leading to physical harm or death. Establishing a regulatory structure of licensing in Virginia will help educate the public on the difference between qualified naturopathic doctors and lay naturopaths as well as provide consumers formal complaint process.

1. Randy A. Sansone, MD and Lori A. Sansone, MD. "Crossing the Line: Sexual Boundary Violations by Physicians" *Psychiatry (Edgmont)*. 2009 Jun; 6(6): 45-48.

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**In Conclusion:**

Licensure will ensure that naturopathic doctors are competent by establishing educational and practice standards. Furthermore, a naturopathic medicine regulatory structure in Virginia will allow enforcement of the state's rules by monitoring licensee activity and implementing disciplinary actions.

As a member of this research committee, you are a champion of public safety. Your support of naturopathic medical regulation will protect the citizens of Virginia from untrained lay naturopaths who may cause harm, and establish a structure under which consumers can have their complaints addressed.

We thank you for the opportunity to share our comments and hope this information, and any future dialogue between the Federation of Naturopathic Medicine Regulatory Authorities and the Virginia Board of Health Professions, will lead to the establishment of regulations that promote the safe practice of naturopathic medicine.

If you have any questions, please call me at 503-244-7189 or email me at ShannonBraden@fnmra.org.

Sincerely,

Shannon Braden, ND  
Program Director FNMRA

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**Number of Disciplinary Actions taken in Oregon against NDs, MDs, and DOs 2013-2019**

Year	Profession	# of Licensees	# of Disciplinary Actions	%
2019	MD	15,927	89	0.559
	DO	1,666	11	0.66
	ND	1,086	1	0.092
2018	MD	11,730	88	0.75
	DO	984	8	0.813
	ND	1,054	10	0.949
2017	MD	15,099	92	0.609
	DO	1,428	21	1.471
	ND	1,030	4	0.388
2016	MD	16,266	101	0.621
	DO	1,537	11	0.716
	ND	1,091	6	0.549
2015	MD	16,266	102	0.627
	DO	1,456	15	1.03
	ND	1,010	5	0.495
2014	MD	15,288	79	0.517
	DO	1,295	6	0.463
	ND	985	3	0.305
2013	MD	14,249	82	0.575
	DO	1,168	11	0.942
	ND	936	0	0
TOTALS	MD	88,559	633	
	DO	9,535	83	
	ND	7,192	29	
AVERAGES	MD	76,346	563	0.737
	DO	8,533	12	0.141
	ND	6,390	4	0.063

REFERENCES: <http://www.oregon.gov/omb/board/Pages/Board-Actions.aspx>  
<http://www.oregon.gov/OMB/board/Pages/Newsletters.aspx>  
<https://www.oregon.gov/obnm/Pages/Discipline.aspx>  
 ND #s provided by email - OR ND Board  
[https://store.aamc.org/downloadable/download/sample/sample\\_id/305/](https://store.aamc.org/downloadable/download/sample/sample_id/305/)  
<https://www.fsmb.org/siteassets/advocacy/publications/2018census.pdf>

**Disciplinary Actions Taken by States from 2010 to July 2020 Physician Acts Related to the Administration of Naturopathic Medical Practice**

State	Practicing without a license	Providing false information to obtain or maintain a license (e.g. failure to disclose information on renewal)	Using false or misleading advertising, or misrepresenting credentials	Engaging in discriminatory behavior regarding which patients are seen or how they are treated	Failing to obtain appropriate patient consent to examine or treat	Failing to follow appropriate charting procedures and/or to maintain record-keeping standards	Engaging in fraudulent insurance/billing procedures and/or financially exploiting patients	Breaching patient confidentiality	Reciprocal action	Failing to report disciplinary action in another jurisdiction	Failing to meet CE requirements
Alaska											
Arizona											
California	1		1			3			1	1	5
Colorado	1										
Connecticut											
Dist. of Columbia											
Hawaii			1								
Kansas											1
Maine											
Maryland	2										
Minnesota											
Montana											
New Hampshire											
North Dakota											
Oregon						3					
Puerto Rico											
Rhode Island											
Texas											
Vermont											
Virgin Islands											
Washington	1	1	3				4		3	1	
TOTAL	5	4	5	0	0	7	4	0	4	2	6

**Disciplinary Actions Taken by States from 2010 to July 2020 Physician Acts that Directly Harm Patients Physically or Emotionally**

State	Providing substandard patient care (e.g., misdiagnosing, failing to use standard care protocols)	Performing an inappropriate procedure that is not in the jurisdiction's scope of practice	Failing to report abuse	Neglecting or abandoning the patient	Inappropriately prescribing drugs (opioids and other legend drugs)	Providing substandard care in the prescription of Cannabis	Engaging in sexual contact with a patient	Violating appropriate doctor-patient boundaries	Exhibiting physical impairment (e.g., alcohol or substance abuse, mental/emotional impairment)
Alaska									
Arizona	6	2			17	14	1	1	9
California	1								
Colorado		1							
Connecticut									
Dist. of Columbia									
Hawaii									
Kansas									
Maine									
Maryland									
Minnesota									
Montana									
New Hampshire									
North Dakota									
Oregon			1	2	11	2	1	3	2
Puerto Rico									
Rhode Island									
Utah	1								
Vermont									
Virgin Islands									
Washington	6			1	32	10	4	2	2
TOTAL	14	3	1	3	60	26	6	6	13

**Disciplinary Actions Taken by States from 2010 to July 2020 Physician Acts that Potentially (Indirectly) Harm Patients**

State	Exhibiting rude or disruptive behavior in the clinic (verbally abusing and/or sexually harassing patients or staff)	Receiving a criminal conviction	Failing to comply with Regulatory Authority Order	UNKNOWN (records could not be obtained for analysis)
Alaska				1
Arizona		2		2
California				
Colorado				1
Connecticut				
Dist. of Columbia				3
Hawaii				
Kansas				1
Maine				
Maryland				
Minnesota				
Montana				
New Hampshire				
North Dakota				
Oregon		1	6	
Puerto Rico				
Rhode Island				
Utah				
Vermont				1
Virgin Islands				
Washington	1		1	1
TOTAL	1	3	7	10

From: CINDY YORK <yorkca@comcast.net>  
Date: Mon, Aug 10, 2020 at 3:21 PM  
Subject: Naturopathic Doctor Licensing  
To: elizabeth.carter@dhp.virginia.gov

August 7, 2020

Dear Members of the Committee,

My name is Cindy York, I have been a Virginia resident for 39 years and I have been under the care of a naturopathic doctor for 5 years. After a 10-year struggle with various health difficulties and seeking care from primary care and specialist doctors, with temporary remission of symptoms at best, I sought out the care of a medically trained naturopathic doctor. After making the prescribed lifestyle and specific nutritional changes, my symptoms significantly diminished within a 6-week period of time. I am delighted to say that as of today, 5 years later, my symptoms have not returned. For perspective, I was a middle-aged, full-time employed, "healthy" endurance runner prior to my decline to a barely able to climb a set of stairs, 16-hour work week employee. I believe it was the education and training that is unique to medically trained naturopathic doctors, and not the incompetence of previous healthcare practitioners that has provided my amazing long-term health turn-around.

As a patient who supports licensure for medically trained naturopathic doctors, I do have a few concerns as it relates to their lack of licensing.

- 1) I see my medically trained naturopathic doctor specifically because she is extensively trained in both conventional and natural medicine, thus providing substantial long-term holistic results that I have not been able to achieve through other medical providers *alone*. However, when seeking the care of a naturopathic doctor there is no compass for knowing if a particular "doctor" is professionally trained and educated. I believe there needs to be standards and accountability as with other health professionals.
- 2) Additionally, it is an added burden that I must make separate appointments with a primary care physician to have basic labs (CBC or COVID-19), imaging, or a physical exam. Medically trained naturopathic doctors could competently provide me with these basic health care services.
- 3) Finally, it would be my hope that licensing medically trained naturopathic doctors would be the next step to insurance coverage. The synergistic preventive care that medically trained naturopathic doctors are equipped to provide is a cost-effective approach to health care and patients should be afforded the opportunity to use our health insurance benefits to subsidize the cost.

I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Cindy York

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**4) Scope of practice.** My primary care physician is retiring and there is a shortage of primary care doctors. NDs have the training to fill this gap and it is proper to allow them to do so. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states. They are credentialed by health insurance companies in 6 states.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,



Laurie Nelson

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Laurie Nelson  
5305 Queensberry Avenue  
Springfield, Virginia 22151

August 8, 2020

Dear Members of the Committee,

My name is Laurie Nelson. I have been a Virginia resident for 57 years and I have been under the care of a naturopathic doctor for one year. I was diagnosed with an auto immune condition for which there is no western medicine cure and the only treatment is high potency topical steroids which thin the skin. The autoimmune disorder I have also thins the skin, so it became a case of western medicine's treatment being as bad or worse than the disease.

Since working with my Naturopathic Doctor, my condition has improved dramatically and I am on the brink of full remission.

I am writing in support of full licensure for medically-trained naturopathic doctors

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

- 1) **Risk of harm.** I was astounded to learn that Virginia does not require the same level of professional accountability and standards of naturopathic medicine as other regulated health professions in Virginia. I had to do the research on my own to locate a fully trained ND who attended medical school. That Virginia does not differentiate a naturopathic doctor from a natural practitioner is reckless in my opinion.

Because I am working with a medically trained Naturopathic Doctor who has 8 years of medical training, my regular Kaiser doctors are in full support of my work with my ND. They acknowledge that western medicine does not have much to offer the extremely broad range of conditions defined as autoimmune.

- 2) **Specialized skills.** Because of her medical training, my ND has been able to coordinate my treatment with my other medical conditions in mind. For example, I have hereditary hemochromatosis...aka iron overload. My ND takes great care in prescribing treatment protocols for my AI that protect the liver, do not increase iron absorption and even some which have been proven via NIH studies to actually chelate iron. It is her medical training that brings her to this level of awareness and that should be made clear in the state of Virginia.

- 3) **Autonomous practice.** Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and knowledge in both conventional and natural medicine. In fact, when I was diagnosed with my AI, my Kaiser doctor referred me to the Kaiser complimentary care physician. That is tacit agreement from one of the largest insurance providers in the Mid-Atlantic region that an alternate approach is a valid course of treatment.

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August 10, 2020

Dear Members of the Committee,

My name is Burma Klein, I have been a Virginia resident for 40 years and under the care of a naturopathic doctor for over one year. I am 75 years old. I am writing in support of full licensure for medically-trained naturopathic doctors, which would allow them to offer physical exams, order lab tests and cat scans, and write prescriptions, which I have to get through my primary health plan. I want them recognized as primary care providers.

Traditional medicine has let me down. All they do is prescribe anti-biotics, which I find difficult to recover from. My naturopath doctor suggests supplements that work much better for me.

Here's why I support licensure for medically-trained naturopathic doctors:

Naturopathic doctors, with their specialized skills, consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.

Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot even test for COVID-19 or run a basic complete blood count. From the patient perspective this creates an added burden - as patients need to then schedule an additional appointment with their primary care provider in order to access labs and basic medications. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, can prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.

Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to **insurance coverage**. Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients who seek their help.

**I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.**

Sincerely,

Burma Klein  
Falls Church, VA

62 113

August 7, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Mikhail Kogan, MD, and I have been working closely with many naturopathic doctors for over 10 years. I am writing in support of full licensing medically-trained naturopathic doctors. As Associate Professor of Medicine and Medical Director of Center for Integrative Medicine at George Washington University I supervise and train dozens of trainees. Our Integrative Medicine program offers all GW Medical students, PA students, NP students, residents, and fellows comprehensive integrative medicine experience. This includes working closely with 3 naturopathic physicians. I have personally supervised training and clinical programs in integrative medicine for over 10 years and can attest very well about quality and training of NDs I work with. Additionally, I have been participating in work of the Academic Consortium for Integrative Medicine and Health, leading national organization that includes NDs in all levels of leadership and work. Through this national collaboration I have not only worked closely with NDs as clinician and educator but also as an advocate and administrator. Lastly, as Founder and Executive Director of AIM Health Institute, DC based local 501c3 that provides access to holistic health and wellness to Medicaid and Vulnerable patients I have also worked closely with NDs who passionate about to care for patients who can't afford typical cash prices of integrative medicine. In short, while there are clearly significant differences in training between MD and ND programs but when it comes to outpatient medicine I see NDs as much superior in treating life style related medical problems such as DM, HTN, HL, obesity and many others. While most NDs are not trained to diagnosed and treat inpatient acute problems their outpatient skills at better or the same as of MDs. The following is summary of key points about licensing Naturopathic Doctors.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while also promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of "naturopathic doctors", which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.

certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Respectfully,

**Mikhail Kogan, MD**  
Medical Director, GW Center for Integrative Medicine  
Associate Professor of Medicine  
Associate Director of Geriatric Fellowship  
George Washington University  
Founder and Executive Director of AIM Health Institute

Board Certified:

ABIM: Geriatric, Palliative, Internal Medicine

ABPS: Integrative Medicine

VA License 0101264270, Exp 03/31/2022

- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.
- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer

From: Rodriguez, Elizabeth R <erodriguez@fcps.edu>  
Date: Mon, Aug 10, 2020 at 3:55 PM  
Subject: letter in support of full licensure for NDs  
To: elizabeth.carter@dhp.virginia.gov  
August 9, 2020

Dear Members of the Committee,

My name is Elizabeth Rodriguez, I have been a Virginia resident for 45 years and I have been under the care of a naturopathic doctor for over 20 years. I am writing in support of full licensure for medically trained naturopathic doctors. I have had several health issues that were never taken seriously or addressed with any real advice or protocols from traditional medical doctors. These medical issues have included insomnia, anxiety, unexplained weight gain, knee pain, hair loss, mild depression as well as chronic and persistent stye infections. I sought help from MDs and specialists who were covered under my medical insurance but after being exhausted and frustrated with no resolution for these conditions for which I sought help I turned to a naturopath for a second opinion. These visits were successful in that I always received a thorough evaluation, a recommended regime and ultimately a resolution. I paid out of pocket every time to get relief for these issues in order to take care of my physical and emotional well-being. If I hadn't followed the advice of a naturopath, I wouldn't have been able to solve any of these issues. The advice I was given by traditional doctors included suggestions to stop drinking caffeine for insomnia or a hot compress and washing my eyes more frequently for my stye condition, it was frustrating to be given advice that was basically no more than what I would have received with a simple google search. Naturopathic medicine has significantly improved my quality of life.

As someone who has been in support of licensure for naturopathic doctors, here are a some of my concerns:

First off, there are practitioners who call themselves naturopathic doctors who have not attended naturopathic medical school. This is extremely confusing, misleading and even risky for the public. We need to know what type of practitioner we are seeing. With more and more people tuning into holistic methods- the demand as you know, has increased considerably in recent years - there needs to be a level of transparency in this arena. This will prevent harm and ensure that constituents are clear about the type of provider that they are accessing.

Right now in Virginia, licensable naturopathic doctors can't perform physical exams, or order labs or imaging - they cannot not even test for COVID-19. There is a shortage of primary care providers in Virginia, and medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments.

Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave

the road to insurance coverage. Currently, medically-trained naturopathic doctors are unable to use the codes needed to gain access to insurance coverage.

We are living in a time of chronic disease, and the burden and impact fall on those who are underserved. All Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are trained to provide. Through licensure of medically-trained naturopathic doctors, Virginians will have added access to safe healthcare.

I urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Elizabeth Rodriguez

Elizabeth Rodriguez

From: Neva Morrison, LCSW <[neva@sweetgrasstherapy.com](mailto:neva@sweetgrasstherapy.com)>

Date: Mon, Aug 10, 2020 at 3:59 PM

Subject: Support letter

To: <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

August 10, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors. My name is Neva Morrison, LCSW, and I have been in private practice as a mental health therapist for over 5 years. I am Board Certified in Social Work. I have worked with several naturopathic doctors in Virginia, one in Richmond, one in Middleburg and one in Fredericksburg. I would have loved to have been able to easily distinguish who is properly trained from who is not, and licensing I feel is necessary to protect those of us seeking a naturopathic doctor. I have found medically-trained naturopathic doctors extremely competent at working safely and collaboratively with all medical providers. Naturopathic doctors are specifically trained in preventative work aimed at restoring health.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while almost promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in

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combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any

objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the Commonwealth. I respectfully urge the Board to recommend licensure.

In Gratitude,  
Neva Morrison, LCSW  
Sweetgrass Therapy  
Owner/Therapist  
804.506.3837

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Dear Members of the Committee,

My name is Antonette Rogers, I was a Virginia resident for 14 years before my recent move to Maryland. I have been under the care of a naturopathic doctor for over 2 years. I am writing in support of full licensure for medically-trained naturopathic doctors. Now, as a Maryland resident, I can access licensed naturopathic doctors and get my visits reimbursed by insurance but because my naturopathic doctor is based in Virginia, where there is not yet licensing, they are unable to properly code my visits, so I am unable to access insurance coverage, which creates additional out of pocket costs for my preferred form of healthcare; not to mention the additional time and coordination required.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Risk of harm.** There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctor(s). A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions. While medically-trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as other regulated health professions in Virginia. I believe this so strongly not only for the continuity of care, but also for patients like myself who choose to take this path for care to ensure we have doctors with the appropriate level of oversight and accountability.

**2) Autonomous practice.** Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medical providers do not have the same training and knowledge in both conventional and natural medicine. This has been the biggest game changer for me in my search for proper care. The training my naturopath has received has made a monumental difference in my care. However, without licensing, naturopathic doctors are unable to: perform physical exams, order labs, order any pharmaceuticals, or order imaging - even though they are well trained to provide these healthcare staples. This creates extra expense for me, the patient, because then I am forced to schedule additional appointments with other doctors for these services rather than have "one stop" shopping with my naturopath. Outside of a financial constraint (I pay way more out of pocket), there is always the potential in communication breakdown between myself, the licensed physician and the naturopath which could easily result in incorrect testing or procedures. Bottom line, I should not have to serve as the go-between for medical professionals, because of the limited licensing for naturopaths. And naturopaths should not have to pull double duty by intervening between multiple healthcare providers for their patients. The licensing practices in Virginia should evolve to support the health and needs of patients. The lack of licensing limits my choice for my preferred form of healthcare. Naturopathic doctors are specialists in prevention using the foundational approaches of lifestyle and natural medicine - which is inherent to their training and essential for addressing the epidemic of chronic disease we have in the United States.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Antonette Rogers

Sent from Outlook

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Elizabeth A. Carter, Ph. D.  
August 10, 2020  
Page 2

I participated in the 2005 licensure effort in various ways to include engaging with Hugh M. Bryan, III, MD, who was, at the time, Chair of the Medical Society of Virginia's ("MSV") Task Force on Naturopathy. As you may recall, the Task Force's work resulted in, among others, this MSV recommendation.

The Virginia Board of Medicine should be responsible for licensing of naturopathic doctors (NDs). An advisory board appointed by the Governor should report to the Board of Medicine. The advisory board should consist of two physician members (MD or DO), two naturopathic doctor members, and one citizen member.

See enclosed MSV letter, dated August 8, 2005, to Elizabeth A. Carter, Ph. D.

I hope that the Committee will consult with the MSV to determine whether it will once again support the licensure of naturopathic doctors in the Commonwealth.

On a different note, and again acknowledging that I am the father of a naturopathic doctor and an attorney, who has provided legal services to the VAANP and other naturopathic medical organizations and doctors, I have observed that, over the past 15 years, the VAANP, the incorporation of which I handled, has matured into an important professional resource, which is ready, in my opinion, to support both naturopathic doctors and the Virginia regulatory board selected to regulate the practice of naturopathic medicine in the Commonwealth should legislation to that effect be adopted.

Please let me know if you have any questions.

Thank you.

*Edward F. Rodriguez, Jr.*

Edward F. Rodriguez, Jr.  
Virginia State Bar No. 8672

Enclosure as stated

cc: Marie Rodriguez, ND, w/encl.

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Edward F. Rodriguez, Jr.  
Attorney at Law  
4133 Evergreen Drive  
Fairfax, Virginia 22032-1018  
(703) 691-0184  
edrodriguezjr@cox.net

Sent by electronic mail to elizabeth.carter@dhp.virginia.gov

August 10, 2020

Elizabeth A. Carter, Ph. D.  
Executive Director  
Virginia Board of Health Professions  
Perimeter Center  
9960 Mayland Drive, Suite 300  
Henrico, Virginia 23233-1463

Re: Regulatory Research Committee  
Review for the Need of  
Regulation of the  
Practice of Naturopathic Doctors in the  
Commonwealth of Virginia

Dr. Carter,

I write to urge the Virginia Board of Health Professions ("BHP") Regulatory Research Committee ("Committee") to recommend legislation to regulate the practice of naturopathic doctors in the Commonwealth.

By way of background and disclosure, my daughter, Marie Rodriguez, a Commonwealth citizen, is a District of Columbia licensed naturopathic doctor. From 2005 to 2018, I was the Virginia Association of Naturopathic Physicians' ("VAANP") pro bono counsel. I have also provided legal services to other naturopathic medical organizations and naturopathic doctors.

On December 10, 2004, my daughter and I met with then Delegate Chap Petersen to discuss the possibility of legislation to regulate, through licensure, the practice of naturopathic doctors. That meeting led to the initial 2005 legislative effort which, in turn, led to the BHP's 2005 Study into the Need to Regulate Naturopaths in Virginia.

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## THE MEDICAL SOCIETY OF VIRGINIA

Representing Virginia Physicians and Patients Since 1820

August 8, 2005

Elizabeth A. Carter, Ph.D.  
Virginia Board of Health Professions  
6603 West Broad Street, 5<sup>th</sup> Floor  
Richmond, VA 23230-1712

Dear Dr. Carter:

Listed below are recommendations from the Medical Society of Virginia concerning the need to regulate naturopaths in Virginia. Our Scope of Practice Task Force thoroughly researched this issue and prepared a report that established the recommendations below. The Task Force reviewed many materials in the process, including:

- The language of HB 2488;
- Websites and curricula of naturopath education programs that are accredited by the Council on Naturopathic Medical Education (CNME), in addition to websites and curricula of programs without such accreditation;
- Requirements of the North American Board of Naturopathic Examiners (NABNE) and technical manuals detailing the certifying examination;
- Multiple statutes and regulations from states that currently license naturopaths;
- Florida's 2004 Sunrise Report on the Proposed Licensure of Naturopathic Physicians.

After extensive discussion and analysis of the issue, the Medical Society of Virginia will support the establishment of licensure for naturopathy in Virginia, subject to the following recommendations:

### RECOMMENDATIONS:

1. The Virginia Board of Medicine should be responsible for licensing of naturopathic doctors (NDs). An advisory board appointed by the Governor should report to the Board of Medicine. The advisory board should consist of two physician members (MD or DO), two naturopathic doctor members, and one citizen member.

- The Code that establishes licensing of NDs should specify that the Board of Medicine will determine requirements for education and testing of the competence of NDs. Board of Medicine regulations should require graduation from a CNME-accredited college and successful certification from the NABNE.
- The Code should require the Board of Medicine to establish regulations to assist the public in differentiating between naturopathic and allopathic/osteopathic doctors. MSV recommends that the regulations include language *similar* to District of Columbia Municipal Regulations (chapter 50): 5003.2:

"...shall provide to all clients or patients a written notice which shall read as follows: *This notice is provided to you pursuant to D.C. Law. I am a registered Doctor of Naturopathy, but I am not a licensed medical doctor and therefore do not practice 'the application of scientific principles to prevent, diagnose, and treat physical and mental diseases, disorders, and conditions and to safeguard the life and health of any woman and infant through pregnancy and parturition.'* An identical notice, in printing of a size to be easily readable, shall be posted in a prominent place in each office or location of practice."

In addition, consideration should be given to restricting the title "physician" to those with MD or DO degrees.

- The Code should include the following definition of Naturopathy (which was present in the Code of Virginia in 1973):

"'Practice of Naturopathy' means the treatment of human ailments, diseases, or infirmities by means of heat, light, diet, massage, baths and other natural agents, but does not include the use of surgery, the X-ray, X-ray therapy, electrotherapeutics, obstetrics, osteopathy, or the prescribing of any drug or medicine."

The Code should direct the Board of Medicine to formulate regulations that detail the scope of practice of naturopaths based on this definition. It is anticipated that the Board of Medicine, based on this definition, would prohibit naturopaths from performing "minor" surgery or writing prescriptions. The ordering of laboratory tests and X-rays should be restricted.

- Special consideration should be given to those patients under the age of 18 and those patients who are unable to legally provide their own informed consent. Since they cannot legally make informed decisions, the Commonwealth has a special interest in their protection. Treatment of pediatric patients by naturopaths should be done only with supervision of physicians trained in the care of pediatric patients. Similarly, those patients who cannot give their own legal consent should be treated by naturopaths only under the supervision of an allopathic or osteopathic physician.

Please note that the final MSV recommendation was to provide the Scope of Practice Task Force Report on Naturopathic Doctor Licensing to the Board of Health Professions during the public comment period of the study on HB 2488. This report is attached.

2924 Emerywood Parkway, Suite 300 ♦ Richmond, Virginia 23294  
804-353-2721 ♦ 1-800-746-6768 ♦ FAX 804.355.6189 ♦ www.msv.org

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We would suggest strongly that the Board of Health Professions, in its deliberations, be mindful of the fact that naturopathy should be complementary to, but not in lieu of allopathic medicine. Thank you for providing the opportunity to comment on this issue. Should you have questions, please contact Jeff Buthe at (804) 377-1035 or [jbuthe@msv.org](mailto:jbuthe@msv.org).

Sincerely,

David A. Ellington, MD  
President

Attachment

2924 Emerywood Parkway, Suite 300 ♦ Richmond, Virginia 23294  
804-353-2721 ♦ 1-800-746-6768 ♦ FAX 804.355.6189 ♦ www.msv.org

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On Mon, Aug 10, 2020 at 4:37 PM Charlotte Clarkson <[clarksoncharlotte@gmail.com](mailto:clarksoncharlotte@gmail.com)> wrote:  
To Whom It May Concern,

On behalf of Naturopathic Doctors in Virginia, I would like to offer my support for licensing naturopathic doctors. I have been seeing my naturopathic doctor for 7 years. She has not only helped me through rough patches in my health and wellness journey but educated me on creating a better environment for my mind and body and for my family as well.

One of my many reasons for visiting my naturopathic doctors has been due to suffering with anxiety issues all my life. I continue to take prescribed medications. She has addressed all the side effects and their possible complications. Through her assistance we realized that hormonal aspects were also impacting my anxiety.

The risk of harm by not licensing ND's is scary to me. People need to have access to naturopathic doctors for their health and well-being. With my naturopathic doctor's specialized skills she has been able to help me with my hormonal imbalances which were contributing to my anxiety. I feel so much better because of her continued care and concern.

Dr Hollon has also helped my 2 daughters with food sensitivities, digestive issues and their monthly periods. Without her vast expertise and knowledge we would only be able to rely on MD's treatments; however, I feel MD's don't look at the whole picture. Naturopathic doctors have the ability to look at the holistic picture of each person.

I would hope the scope of work by ND's could be broadened and supported so we could have lab work done like physical exams, basic CBC and other testing as they do in other licensed states. The work done by naturopathic practitioners offers a different perspective to the allopathic medicine practiced by most medical professionals in America. The public should be given the opportunity to make considered choices in meeting their medical needs in a variety of sanctioned ways.

Thank you for your consideration of this important licensing consideration.

Best Wishes,  
Charlotte Clarkson

From: Susan Siegel <[suznsiegel@gmail.com](mailto:suznsiegel@gmail.com)>

Date: Mon, Aug 10, 2020 at 4:47 PM

Subject: Comment on the Review for the Need of Regulation of the Practice of Naturopathic Doctors in Virginia

To: <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

August 10, 2020

I would like to voice my support of the licensure and regulation of naturopathic doctors. I would specifically like to address the criterion of Risk of Harm. I have used naturopathic doctors several times since the 1990's, in several states, as a complement to allopathic medicine and have found it most useful. I would like to share with you the most recent issue, which has brought me again to a naturopathic doctor.

In 2007 I was diagnosed with breast cancer. I was found to have a BRCA mutation that made my chance of recurrence or a second breast cancer quite high. Having lost family members to this disease, I opted to have a bilateral mastectomy. I had done all I could to reduce my risk, I lost weight, I changed my diet, and exercised regularly. Unfortunately, this is not 100% effective in prevention and in 2019 I received a second breast cancer diagnosis, unrelated to my first diagnosis.

At this point, I was well educated in breast cancer treatment and side effects from treatments. As much as I knew, I needed help to coordinate the management of my side effects and to make sure the supplements I was taking were the right ones given my health conditions. That is when I began to utilize the services of a naturopathic doctor again.

I had asked my radiologist oncologist what supplements I could take during my course of 33 radiation treatments. I had been taking several prior to my treatment, and she said it was ok to take most of them. However, my naturopathic doctor took me off most of them and put me on a different regimen during my treatment time that was relatively simple. My doctor and nurses were amazed at how well my skin did through treatment, as it wasn't the norm.

As I moved on to recovery from radiation, and began my 5-year treatment with an aromatase inhibitor, I relied on my naturopathic doctor to help me develop a plan to deal with the after affects of treatment and side effects of the aromatase inhibitor. My plan has been shared with my medical oncologist who has been quite supportive of my treatment and willing to work with my naturopathic doctor.

Having this option has greatly helped to heal my whole body. I am confident in the knowledge of my naturopathic doctor, as I know she has had appropriate training. But I have had to rely on my own research to make sure of this. Regulation of naturopathic doctors can only serve to ensure that doctors are licensed and practicing safely and appropriately, and it has my full support.

Thank you,

Susan Siegel  
2524 Straw Bridge Chase E  
Richmond, VA 23233

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66 129

From: Clara Sartor <c\_sartor@scnm.edu>  
Date: Mon, Aug 10, 2020 at 4:58 PM  
Subject: Public Comment/BHP Study Letter  
August 10<sup>th</sup>, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in the great state of Virginia. My name is Clara Sartor and I have been a naturopathic medical student for the past 2 years. I was born and raised in Virginia, have a sister finishing her MD residency in North Carolina, and plan to return to the East Coast to practice when I graduate. I am writing to you today in support of fully licensing medically-trained naturopathic doctors.

I was starting my medical journey following a traditional allopathic route, majoring in pre-med, and preparing for the MCATs when I discovered naturopathic medicine. I had struggled with insomnia and chronic back pain since I was a child, and while I had tried numerous allopathic doctors and specialists, the only modalities that helped me were acupuncture and herbal supplements. Growing up in Virginia, I never had access to a naturopathic doctor. I didn't even know this medicine existed or that it had been what had helped me when other branches of medicine had failed. Naturopathic medicine is not only effective, but it can treat a variety of conditions given that a naturopathic doctor is trained as a primary care provider. As my sister completes her residency in family medicine, also for primary care, it has never become clearer to the both of us the need for primary care physicians on both a national and global scale and the place naturopathic medicine and medically-trained naturopathic doctors have in the healthcare industry.

To Prevent Risk of Harm to the Consumer:

Undoubtedly the most important reason for licensing medically-trained naturopathic doctors is to prevent the risk of harm to the patients and public. The general public is unaware of the difference in levels of education, training, and clinical experience between a medically-trained naturopathic doctor and a lay naturopath. Medically-trained naturopathic doctors must graduate from an accredited naturopathic medical school, requiring two years of basic sciences including anatomy, biochemistry, microbiology among other subjects followed by two years of clinical training, similar to the education of a medical doctor. Additionally, a certain number of patient contact hours must be met and the naturopathic student must pass numerous examinations by the North American Board of Naturopathic Examiners on structure and function, disease and disorder, pharmacology, nutrition, botanical therapies, and physical medicine in order to receive their degree. This is of course on top of the pre-requisites needed to enter admission into the naturopathic medical school. Furthermore, the medically-trained naturopathic doctor must keep up with their license by the Council on Naturopathic Medical Education via continued education courses.

I'm sure you were already aware of the rigor of training and regulations set by numerous factions to ensure a naturopathic medical doctor stays up to date and certified; so

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MD degree. At EVMS, protocols are in place for oral Vitamin C as both a prophylactic, preventative measure as well as IV use at higher dosages for those experiencing severe COVID-19 symptoms. Licensing naturopathic medical doctors is essential for these proven, effective natural remedies to be made more available to the public.

In conclusion, I hope you find that licensing medically-trained naturopathic doctors is essential for patient protection from those lacking medical training and for public health so that Virginians may have access to affordable, effective naturopathic treatment options. As a Virginia native, my desire is to come back to my home state and provide patients with the care and treatment options that were never made available to me as a child but that helped me significantly so much so that I wanted to become that kind of doctor myself. Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. For all of these reasons, I respectfully urge the Board to recommend licensure.

Thank you.

Sincerely,

Clara Sage Sartor

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why mention them? At present in Virginia, lay naturopaths may use the term "naturopathic doctors" without having gone through that medical training or regulation. We ask for licensure and regulatory framework to provide clarity to the patients, which at present is lacking, as it is confusing to the public that non-medically trained naturopaths may use the term "naturopathic doctor". More concerning, it poses a great threat to patients as non-medically trained naturopaths do not have a medical degree or the training as that of a medically-trained naturopathic doctor. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor" and they should be held accountable by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.

Economic Impact:

The economic impact of licensing medically-trained naturopathic doctors is both essential and beneficial to practitioners and patients. The demand for primary care physicians has been increasing for years and it has never been truer than with the COVID-19 pandemic. Licensing will increase the number of naturopathic doctors, and thus primary care physicians, in Virginia, which will give patients increased access and decreased costs. Naturopathic medical doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are currently being driven to put their financial resources into bordering jurisdictions. This resonates with me on both levels as I did not have access to a naturopathic medical doctor as a pediatric patient, and I desire the opportunity to come back to my home state after receiving my degree to practice fully.

Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide. This particularly impacts the elderly, the patient population whom I most want to help, yet whose incomes, often fixed, do not allot for the fees of uninsured health care. The elderly population, as well as the general public, often faces medical concerns such as chronic pain, just an example of a malady which the naturopathic medical community is so equipped to treat. If licensed, insurance such as Medicare and Medicaid could help cover these services providing natural and effective forms of medical treatment to the community.

Specialized Skill and Training:

Naturopathic doctors have an array of tools to treat conditions on both the preventative and intervention levels of action. Regarding COVID-19, naturopathic doctors help with the preventative aspects in both immune health as well as with the prevention of the comorbidities, such as Diabetes Mellitus and cardiovascular disease, that put individuals at higher risk of catching and dying from the disease. One of our natural therapeutics is intravenous (IV) vitamin C, which is now being used by medical doctors including accredited, allopathic schools such as Eastern Virginia Medical School (EVMS) where my sister earned her

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From: Mary Lynne Schmohl <marylynneschmohl@gmail.com>  
Date: Mon, Aug 10, 2020 at 5:13 PM  
Subject: Naturopathic Doctor Licensure Study  
To: <elizabeth.carter@dhp.virginia.gov>

August 10, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors. My name is Mary Lynne Schmohl, and I was diagnosed with anaplastic ependymoma of my spine 2.5 years ago. Prior to my diagnosis, I was in and out of the ER with various things related to my cancer, felt exhausted all the time, and was having a lot of stomach issues. Even once I had my diagnosis, I needed a lot of supplemental support for surgery, radiation, and every day to feel more normal. My naturopathic doctor helped supplement me appropriately during treatment to feel healthy, while communicating with my medical teams at NIH and the University of Maryland Proton Treatment Center to make sure that there would be no counter-interaction with my treatments. I had appropriate testing done through my naturopathic doctors to understand my stomach issues, and my ND helped me build a plan to decrease my exhaustion. I have found medically-trained naturopathic doctors look at the patient more holistically and make the experience more seamless working collaboratively and safely with medical providers to make sure that I have the right support in whatever period of treatment (or non-treatment) that I am in. Naturopathic doctors are specifically trained in preventative work aimed at restoring health.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath. Licensure will provide clarity -- while promoting safety and access to patient desired care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

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- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect this. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises related to pain, addiction, chronic disease, and mental health illness. They work collaboratively with all providers.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia. There are a number of naturopathic doctors that travel to DC or Maryland in order to provide care which detracts from our local economy.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, there resources are limited which includes submitting a complaint to the Better Business Bureau, or filing a lawsuit. But it doesn't protect others from future harm. These alternatives are inadequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. Registration in the State of Virginia has decreased in its usage and is not adequate when you are referring to medically trained providers.

Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,  
Mary Lynne Schmohl

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training. All medically-trained professionals pose some possible risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.

2) **Specialized skill and training.** Medical training of naturopathic doctors provides distinct skills that are unique compared to lay naturopaths and other medical providers. Naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. Naturopathic doctors are experts in their field related to natural therapies and they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

The other points under consideration are all important. I will confine my input to the above two.

Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the Commonwealth. It will be good for the profession, for our State and for our citizens. I respectfully urge the Board to recommend licensure.

Sincerely,  
Lorraine Austin

PS, my letter is also attached

Lorraine Austin  
(M) 757-897-8976  
><(((e>.....>(((e>.....>(((

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On Mon, Aug 10, 2020 at 5:52 PM Lorraine Austin <lorraine67austin@gmail.com> wrote:

Lorraine Austin  
208 Crittenden Lane  
Newport News, VA 23606  
757-897-8976 (M)

Virginia Department of Health Professions  
Hearing regarding GA 2020 (SB858/HB1040)

August 10, 2020

Dear Members of the Committee,

I am writing in support of licensing of naturopathic doctors. I was always reluctant to use naturopathic treatments on my own. In the past few years my Family Doctor has become certified in Functional Medicine which helped break down my apprehensions. Then, two and a half years ago I developed a very serious and painful autoimmune condition and I finally turned to a medically-trained naturopathic doctor.

With every medical profession, it is important to have oversight to ensure accountability and public safety. As I have experienced my own care and treatment under a Naturopathic Doctor I have learned much about the profession that speaks to the seven criteria used by the Board, as they relate to licensing naturopathic doctors. I address two below:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and

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On Mon, Aug 10, 2020 at 7:51 PM Jeanette Lesine <[jeanette.lesine@capitalone.com](mailto:jeanette.lesine@capitalone.com)> wrote:

Ms. Carter-

I am writing to you in support of Licensing of naturopathic doctors in Virginia. I have been a patient of a naturopathic doctor in Richmond since September 2013. The purpose for me finding a naturopathic doctor in 2013 was because I was coming off of hormones, had severe hyper thyroid issues, and my blood pressure was dangerously high. I was at my wits end as I had been to several doctors and tried a host of blood pressure and other medicines that my body could not process which was manifested in allergic reactions. My doctors had nothing else to offer me and so this is when I turned to a naturopathic doctor. The good news is that our work together was successful where my body was able to reset and stabilize.

Over the years my naturopathic doctor has worked in partnership with all of my doctors which included my primary care doctor, endocrinologist, gynecologist, and cardiac specialist to provide the right natural therapies for me. I continue to see my naturopathic doctor today and I am 66 years old and in very good health. I don't think that my health would be as good without access to naturopathic medicine.

Establishing a responsible licensing framework for the practice of naturopathic medicine in Virginia is a strong promotion of patient access to safe and quality healthcare of their choice. Naturopathic Doctors (NDs) are medically-trained and educated professionals who are well-qualified to help meet the growing demand for expanded options in healthcare and the much needed options in healthcare. They are able to find alternatives for those that don't respond to typical therapies and serve a niche in our current medical system.

Licensing naturopathic doctors fosters increased safety by providing transparency to the public and other medical providers. More specifically, licensing naturopathic doctors is the only way to adequately distinguish medically trained naturopathic doctors from lay providers or lay naturopaths. Without this measure of transparency and public knowledge- it provides confusion between the two. This impacts safety and the professional standards of medicine.

As you are most likely aware, naturopathic doctors are trained in primary care but are unable to work to the full scope of their training within Virginia. In other states they work autonomously where they can to perform physical exams, labs or run imaging. Naturopathic doctors should be able to work within our state as they do in almost half the country.

I have a good team of doctors and I am grateful for each of their support. In my case it took my naturopathic doctor and my traditional doctors to get me to the best possible outcome.

I am strongly in support of licensing naturopathic doctors and hope that you will give your support as well. Please let me know if I can answer any questions or provide additional information. Thanks so much for your consideration.

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On Mon, Aug 10, 2020 at 8:44 PM Cassidy Morris <[Cassidy.Morris@nunm.edu](mailto:Cassidy.Morris@nunm.edu)> wrote:

August 10, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Cassidy Morris and I am writing to you as a current naturopathic medical student in my 3<sup>rd</sup> year at the National University of Natural Medicine, known as NUNM, in Portland, OR. I grew up in McLean, Virginia and was born in Alexandria, VA. I am writing in support of full licensing medically-trained naturopathic doctors.

By establishing licensure for naturopathic doctors in the state of Virginia, not only would patients benefit from the modalities in which NDs are trained but those patients that want a more directed and supported health plan can choose to work with an ND to provide effective support and education desired by the patient. Confident that their ND is providing the best and most effective scope of practice that they are trained to offer and without having to make unnecessary appointments with other providers for basic needs. If NDs were recognized in the state of Virginia, there is no doubt in my mind that majority of my friends, family, and neighbors would seek out their care.

As a naturopathic medical student that studied biochemistry in my undergraduate, and at the age of 13 planned on attending physician assistant school, I do believe I can speak to the legitimacy of the four-year graduate-level program NDs undertake. Prior to coming to medical school, I worked for a top doctor based out of Vienna, VA with a concierge practice that focused heavily on individualized medical treatments. While working for this internal medical doctor, I helped research and generate recommendations for specific health ailments that were provided in detailed reports to patients. With the different modalities that naturopathic doctors are trained in that align with evidence-based medicine, I believe the healthcare system and care provided to patients would greatly increase focus on treating underlying conditions, that is chronic illnesses, and allow patients to get individualized care if NDs were licensed and allowed a regulated scope of practice.

In hopes of potentially moving back East after graduating, it would be a dream to be able to work as an equal healthcare partner in an integrative medical office that could allow multiple medical providers to serve the health needs and desires of each patient. In addition, with the years and hours spent in my education, and the amount of debt that is accumulated in medical school, I strongly desire to be able to use the titling and credentials of being a Naturopathic Doctor, after my name, and have them be as meaningful in Virginia as they are in licensed states. Naturopathic doctors' study both an intense curriculum and take two standardized exams to be eligible for licensure. (The first taken after the first two years of basic biomedical sciences for a half-day, and the second taken after graduation for three days on the clinical sciences.) Using the title, "Naturopathic Doctor" should relay to the public that the individual has undergone this rigorous training and education, and patients should have confidence that the person they are choosing for their care is able to provide the specialized attention and healthcare needed, with as little red tape as possible.

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From: Meg and D.J. McDyre <[mcdyre@comcast.net](mailto:mcdyre@comcast.net)>

Date: Mon, Aug 10, 2020 at 8:27 PM

Subject: support of licensure for medically-trained naturopathic doctors

To: [elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)

August 3, 2020

Dear Members of the Committee,

My name is Margaret McDyre, I have been a Virginia resident for 20 years. I am writing in support of full licensure for medically-trained naturopathic doctors.

Recently, I started seeing a naturopathic doctor to help find natural solutions to a few of my medical problems'. After my initial appointment my naturopathic doctor suggested a short list of medical tests that would be beneficial for me to have done, to see if the supplements they think I need (by the symptoms I have), would be a good option for me. They do not want me to take the supplements if the symptoms I am presenting are actually a medical condition, not a lack of a nutrient in my body. When I went to my medical doctor for my annual physical, I discussed with her the list of tests that the naturopathic doctor suggested, and she refused to write an order for me to get some of them, even after I said I would pay out of pocket out of them, and would not need to go through insurance. I explained the reasoning behind the tests and she said she was not comfortable writing the order and would not do it. When I went back to my naturopathic doctor, they explained that they were not able to write an order for medical tests in the state of Virginia. To say I was surprised by this is an understatement!

I am not interested in replacing my medical doctor, just supplementing and accentuating my medical 'tools' in my toolbox, to speak metaphorically. I am a firm believer that knowledge is power and allows one to make sound and logical decisions regarding their life and their health. Currently, I feel as though my hands are tied and I am unable to get the best medical care possible, as my naturopathic doctor is limited in their abilities to best assess my personal needs. I am not upset with my medical Doctor's unwillingness to sign the order, but I do feel like her lack of understanding and knowledge of the naturopathic way's has made her a bit shortsighted. I would assume many medical doctors feel this way, which in turn is detrimental for the overall health and well-being of the patient.

Thank you for taking the time to read my letter. Please take serious consideration on allowing naturopathic doctors to have licensure in the state of Virginia. It will only allow for choices for your residents.

Sincerely,

Margaret McDyre

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Currently, there are 82 students at the various accredited naturopathic medical schools that have expressed interest practicing in Virginia after graduation. I request the Board to recommend licensure for medically-trained NDs, and I know other ND medical students and recent graduates are submitting written comment in support of licensure as well.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

1. **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while also promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of "naturopathic doctors", which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.
2. **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training: skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.
3. **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
4. **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.

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5. **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
6. **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
7. **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process does not offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure. Thank you.

Sincerely,

Cassady Morris

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services I personally have benefited from namely Breast Thermography and the IonCleanse Foot baths. I plan to visit Core Health for many years to come. Many thanks for all you do, Cindy Chronister!

I don't go by doctor and I don't practice medicine. We offer a service for lymphatic therapy that has literally changed people's lives. I share clients with medical doctors, nurse practitioners and naturopathic doctors alike. We have a deep respect for each other and work well together in making sure my clients and their patients get the results they deserve.

I am asking that you vote NO, not because I want to hold back the rights for Naturopathic PHYSICIANS to enjoy the rights of medical professionals, but to maintain my right to help my clients and offer them options for their well being.

Thank you for taking time to consider the desires of all those involved...I venture to say that there are many more Traditional Naturopaths in Virginia who would be harmed by this than the number of Naturopathic Doctors that may benefit.

Blessings,

Cindy

Cindy Stillwell Chronister  
(434) 207-4810

Core Health and Wellness  
5574 Richmond Road, Suite 205  
Troy, VA 22974 (Just East of Charlottesville -- Interstate 64 Exit 138)  
[www.CoreHealth.com](http://www.CoreHealth.com)



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On Mon, Aug 10, 2020 at 9:25 PM Cindy Stillwell Chronister <[cindy@corehealth.com](mailto:cindy@corehealth.com)> wrote:

Hello Dr. Carter,

Thank you for your time in protecting Virginians and for listening to all who have a vested interest in the outcome of the Naturopathic Bill.

I am a native Virginian and proud to also be a Traditional Naturopath. My education consisted of many years (hundred of hours) of classroom training, online training, internships, and mentoring. I have an office in central Virginia and my clients come from all over the state.

Instead of telling you my reasons for not voting yes on licensing naturopaths, I am going to share what my clients have to say. Please take a moment to hear their hearts and what their lives might be like today without the services we offer in my office.  
S.B.

In 2013 I was diagnosed with cancer and after having surgery I discovered swelling in both of my legs that was not there before. The swelling of lymphedema is excruciating and I would just lay in the best resting up to do one thing each day. It was not until I met Cindy Stillwell Chronister, that my life would change for the better. After each appointment of electro lymphatic therapy I saw the swelling go down and my energy level increase. Cindy is the reason I can now walk three miles every morning. She gave me hope and a return to myself that I never thought possible. I have more confidence in myself now and want to give back to others. I am so thankful to have Cindy in my life and I share the hope that she has given me with others.

B.Y.

Cindy and Core Health helped so much through a really difficult time with Evox and Bach flowers. My daughter was struggling with some anxiety while her dad was on active duty military and sleep and Cindy was able to provide some holistic solutions that really helped our family. She has been able to approach my health from a foundational aspect rather than just seeing a bunch of individuals about symptoms but never really addressing the actual cause or roots. The office is gorgeous and feels safe and warm.

T.W.

Cindy Chronister, owner of Core Health and Wellness, is a miracle worker and a true blessing. I met Cindy a few years ago after suffering from a series of health crisis: thyroid cancer which lead to an extensive bilateral neck dissection and a stroke a year later. I was initially diagnosed with thyroid cancer in 2011 and had a total thyroidectomy. The cancer continued to grow and the following year a bilateral neck dissection was performed. The doctors removed 38 lymph nodes (some cancerous) from around my neck. Missing so many lymph nodes caused lymphedema and limited neck mobility. Discovering Electro Lymphatic Therapy at Core Health has truly been life changing. Thanks to Cindy and her extensive knowledge of the lymphatic system, she is able to decongest the stagnant lymph. The treatments have made such a significant difference with increased energy and mobility! Core Health also offers several other

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11513 Sadler Glen Lane  
Glen Allen, VA 23060  
August 10, 2020

Virginia Department of Health Professions  
9960 Mayland Drive  
Suite 300  
Henrico, Virginia 23233

RE: Review for the need of regulation of the practice of naturopathic doctors

Dear members of the committee,

Thank you for reviewing the need of regulating naturopathic doctors (NDs) in Virginia and the preliminary documentation that came out of it. We have had a number of experiences over the last several years with naturopathic doctors, and we are writing in support of licensure for them. We would like to comment specifically on a few of the criteria as it relates to our personal history as consumers and patients.

**Risk of Harm:** In your document, you don't call out the risk associated with the confusion created by providers that call themselves naturopathic doctors but have not attended the rigorous medical school curriculums required by true, naturopathic doctors. It is very confusing as a consumer to understand that some people that call themselves naturopathic doctors do not have the same level of education as others by the same title. Especially when we started the journey of looking for an ND, it was difficult to know the things to look for and ask because we naturally assumed, incorrectly, that NDs were state licensed just like any other doctor that completed medical school. There is a risk of harm to a patient in assuming a provider is more educated than he or she truly is, and that risk is very real in Virginia because we have no state regulating body ensuring NDs meet common, industry-accepted, educational minimums. Not only is the risk to working with a provider that is not as educated as expected, but there is a risk of financial impact of continued out-of-pocket expenses to such providers that potentially are not improving your health. On the more dire side, there is risk to harm of delayed healthcare with a more qualified provider when you may have serious health concerns that are not adequately identified or treated by a provider that doesn't have the education and training necessary for the condition. Having the Department of Health Professions (DHP) license NDs would greatly diminish the confusion and risks consumers face today when looking for natural and holistic practitioners, which I truly believe is a growing trend. It is certainly something we personally hear about more than we ever did even just a few years ago.

**Specialized Skills and Training:** A naturopathic doctor requires a great deal of education to provide a truly holistic approach that encompasses homeopathic remedies, nutrition, prescription drug interactions, and general wellness. When I think of the benefits the naturopathic doctor we have worked with have provided to us, we believe they have more education and training than most allopathic doctors we've seen over the years. Don't get me wrong, our allopathic doctors have done great things as well, especially when we had to deal with a stage 3 breast cancer diagnosis several years ago, but many allopathic doctors focus on drug therapies as a primary care delivery mechanism. We've

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learned over the years that there are many things we can do aside from just drug therapies, and our naturopathic doctor has educated us in many ways that incorporate drug therapies from our allopathic doctors but also complementary guidance such as nutritional approaches and lifestyle changes. The degree of understanding our doctor clearly possesses covers prescriptions, supplements, nutrition, and a holistic understanding of how everything we do and consume interacts with each other and affects our overall body's health. To have this knowledge most definitely requires specialized skills and training, and having licensing of NDs would make it clear that having the title of ND means you have this type of training and have proven your knowledge of it.

**Economic Impact:** The report indicates that Virginia has both NDs and "traditional naturopaths" in practice, and "if practice is limited in the Commonwealth to only those naturopaths able to be licensed in the state, there may be an increased cost to the consumer based on the simple economic principle of supply and demand." I don't see it this way at all. For those patients seeing traditional naturopaths currently, if they are happy with their providers, licensing NDs will not mean they have to stop seeing those naturopaths. Licensing NDs shouldn't mean that traditional naturopaths go out of business; it simply means the general public will be able to distinguish a more highly trained and educated naturopathic doctor vs. a traditional naturopath by the license designation. There is definitely a place in Virginia for both licensed NDs and traditional naturopaths such that I don't believe there will suddenly be a surge in demand only for licensed NDs that would create an increased cost to consumers. I actually believe the economic affect will be positive for the consumer. In my case, my insurance would cover naturopathic services, but it won't today because NDs aren't licensed and can't provide the billing / insurance codes required to submit a claim. If licensed, NDs could provide claim information like this, I would be able to submit claims, and I could actually have insurance coverage instead of the out-of-pocket costs we pay now, which, like all medical providers, is expensive. My insurance covers naturopathic doctors in states that have licensing and can properly code medical claims. The cost for many consumers will be far lower as a result of licensing NDs due to potential insurance coverage, as it would be in my case.

We have seen numerous, and some significant, benefits since we found and started seeing a naturopathic doctor. They have provided services and advice that have made a real difference in our health, but it is very clear to me that licensing NDs would make every aspect of finding, comparing, and paying for an ND so much safer and easier for a consumer. I am requesting that you please consider updating the criteria sections I mentioned to include some of the points discussed, and I encourage you to please recommend licensure for naturopathic doctors in the Commonwealth as it will benefit the thousands of patients that look for and utilize these types of providers every year. If you have any questions or would like any additional information regarding this, please call me, and I'll be happy to provide additional details.

Sincerely,



Christopher and Christine Bohn  
(804) 385-9664 (Chris), (804) 651-2522 (Christine)

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trained naturopathic doctors as well as to provide. Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia. Sincerely,

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From: Sarah Coenen Suettinger <coenen.sarah@gmail.com>  
Date: Tue, Aug 11, 2020 at 1:28 PM  
Subject: Letter in support of licensure for medically-trained naturopathic doctors

August 3, 2020 Dear Members of the Committee, My name is \_\_\_\_\_, I have been a Virginia resident for \_\_\_\_\_ years and I have been under the care of a naturopathic doctor for over \_\_\_\_\_. I am writing in support to full licensure for medically-trained naturopathic doctors. [Insert a few sentences of how you've personally benefited from working with a medically-trained naturopathic doctor.] As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to these criteria. [choose one or two of the below to focus on and personalize as much as possible.] 1) Risk of harm. [There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctor. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is a risk of harm in medical professions; while medically-trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia.] 2) Specialized skills. (Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between conventional and traditional medicine practice.) 3) Autonomous practice. (Naturopathic doctors practice autonomously in a number of jurisdictions that offer regulation. It seems medically-trained naturopathic doctors specifically because other medical providers do not have the same training and knowledge in both conventional and natural medicine.) 4) Scope of practice. (Currently, medically-trained naturopathic doctors can't offer physical exams, or order lab or imaging; they cannot note test results for COVID-19 or run a basic complete blood count. From the patient perspective, this creates an added burden - as patients need to schedule an additional appointment with their primary care provider in order to access lab and basic medications. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for additional appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for

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mental health support), mean that patients are now requiring more access to providers who are well-trained to provide medical services - including prescriptions, such as basic antibiotics and anti-hypertensives. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.) 5) Economic impact. (Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to operate coding that would enable insurance coverage. In the era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access to preventative health care services that medically-

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On Wed, Aug 12, 2020 at 11:29 AM Virginians for Health Freedom <va4freedom@gmail.com> wrote:  
Dr. Carter,

Virginians for Health Freedom believes every Virginian has the right to health care of their choosing from the provider of their choice. This includes unlicensed natural health workers. We also believe that natural health does not pose any risk of harm to citizens or consumers in Virginia and should remain unregulated.

Our position is that any law creating licensure of Naturopathic Doctors in Virginia must provide exceptions and protection for these unlicensed workers who do not pose a risk of harm to our citizens.

Donna Lewis, President  
Virginians for Health Freedom

6520 Iron Bridge Rd., Ste. G  
North Chesterfield, VA 23234  
website: [va4hf.org](http://va4hf.org)

71 148

On Wed, Aug 12, 2020 at 3:02 PM Satish Soni <satishsonipe@gmail.com> wrote:

August 12, 2020

Dear Members of the Committee,

My name is Satish Soni. I have been a Virginia resident for 18 years and I have been under the care of a naturopathic doctor for over 5 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

A Naturopathic Doctor helped me by looking at me as a whole and recommended additional testing. With the help of additional testing, my Primary Care Physician was able to diagnose the problems. Working with an MD, they were jointly able to develop a treatment plan with prescription drugs and supplements. Although not required by legislation, I have reported the supplements to my pharmacist also so that it is coordinated with prescription drugs for any interactions.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to me:

**1) Risk of harm.** There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. In the interest of the safety of the residents of Virginia, it is best if only qualified ND are able to call themselves Naturopathic Doctors for their practice.

**2) Specialized skills.** Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. While many of the healthcare services that NDs are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that aren't included or emphasized in other practices.

**4) Scope of practice.** Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they can not even test for COVID-19 or run a basic complete blood count. They are not allowed by law to give a medical diagnosis for my medical records, and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from an ND.

**5) Economic impact.** Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage.

My daughter is a Bio-medical Engineer with ND degree she recently received a License to work in CA. She completed her high school in Fairfax, undergrad degree from UVA but is unable to practice in VA due to lack of license.

Licensing medically-trained naturopathic doctors will provide additional safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,  
Satish Soni  
Fairfax, VA

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200 East Roosevelt Road Lombard, Illinois 60148-4539  
P 630-889-6603 F 630-889-6800 Erswenson@nuhs.edu

August 10, 2020

Virginia Board of Health Professions Regulatory Research Committee

Dear Members of the Committee,

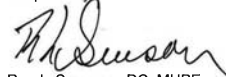
National University of Health Sciences is writing in support of fully licensing medically trained naturopathic doctors.

Currently, there is an upward need and desire to have more professionals with a specialized background and skill set in states where there is no licensing option for naturopathic physicians. Especially with regards to utilizing complementary and alternative medicine in pain management. Not only do they provide medical guidance, but they look at the overall, encompassing, and underlying conditions by recommending dietary changes, physical medicine, and natural pain-relieving botanicals.

National University of Health Sciences strongly supports licensing of medically trained naturopathic doctors by the Commonwealth of Virginia and encourages the Board to make a recommendation for licensure.

Please let me know if you have any questions. Thanks for your time and consideration.

Respectfully,

  
Randy Swenson, DC, MHPE  
Vice President for Academic Services  
National University of Health Sciences

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On Wed, Aug 12, 2020 at 4:03 PM Amita Soni <zamitasoni@gmail.com> wrote:  
August 12, 2020

Dear Members of the Committee,

My name is Amita Soni. I have been a Virginia resident for 18 years and I have been under the care of a naturopathic doctor for over 5 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

I had been suffering pain for many years. A naturopathic doctor helped me to diagnose my disease with additional testing request, which I submitted to my PCP which she was able to diagnose my disease. MY PCP and naturopathic doctor, together were able to help me deal with my disease. The naturopathic doctor was able to get me a treatment plan and help me control my disease.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria..

**1) Risk of harm.** (There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low-risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia. As a patient, I also want to know that if an ND causes harm, they will be disciplined by a regulatory board with the authority to restrict a practice license – not just sued in civil court or reported to a business bureau.)

**2) Specialized skills.** (Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. While many of the healthcare services that NDs are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that aren't included or emphasized in other practices.)

**3) Autonomous practice.** (Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and



knowledge in both conventional and natural medicine. I also trust my ND to refer me to a specialist or another healthcare provider, in order to ensure the best care possible. )

**4) Scope of practice.** (Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. They are not allowed by law to give a medical diagnosis for my medical records, and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from an ND. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services.

**5) Economic impact.** (Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.)

**6.) Alternatives to regulation.** (There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient and a consumer, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities.)

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

(Amita Soni  
(Fairfax, VA)

On Wed, Aug 12, 2020 at 7:54 PM Melissa Mortimer <[melissa.m.mortimer@gmail.com](mailto:melissa.m.mortimer@gmail.com)> wrote:

Dear Committee Members,

My name is Melissa Mortimer, and I have been a resident of Virginia for just over 15 years. I have been under the care of a couple of different naturopathic doctor since approximately 2010, approximately 10 years. I am writing to let you know that I support the licensure of naturopathic doctors.

Both of my daughters, my husband and I have all benefited from naturopathic care over the last decade. Generally, whenever I have a medical issue that seems particularly difficult to solve, and I have had little to no luck with traditional medicine, naturopathic medicine has helped us get to the root of our problems and get healing. I have used naturopathic doctors to assist me in hormone balancing, digestive issues, and chronic pain following a car accident to name a few. My husband has gotten help in lowering his cholesterol. My older daughter received help with skin rashes.

As a patient who supports licensure, I have a couple of concerns. First, I am concerned with economic impact. I believe that licensure would pave the way for coverage by insurance companies, thereby making care much more affordable. This would be huge, as it would allow many more people to have access to this wonderful, holistic care. It would provide another avenue for care and would relieve overburdened traditional care routes. I know that, even though we live a fairly comfortable life, I do not feel that I can always get care from naturopathic doctors as much as I would like due to the great out of pocket costs, as I have no insurance coverage for such care. I support licensure so it could lead to insurance coverage and better and more affordable access to care for all Virginians.

My second substantial concern relates to scope of practice. I think it would be so beneficial for naturopathic doctors to be able to perform physical exams and testing/testing referrals. Allowing naturopathic doctors to perform these basic services would avoid duplicative appointments with traditional primary care doctors. Quicker, more streamlined access to health care would be achieved for Virginians. I know that I have had to seek medical care by a naturopathic doctor in a different jurisdiction in the past to be able to get simple blood work performed. Increasing scope of practice in the construct of licensure would help keep patients seeking medical care in their own cities and towns instead of elsewhere.

I respectfully urge the strong consideration and recommendation of licensure for naturopathic doctors in Virginia. I know that my family and I have seen significant health improvements in seeking such care, and I think that for the above-stated reasons, licensure would help deliver this important care to more Virginians.

Sincerely,

Melissa Mortimer

Alexandria, Vir

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On Thu, Aug 13, 2020 at 7:08 AM Docherbs59 <[docherbs59@aol.com](mailto:docherbs59@aol.com)> wrote:  
Good Morning Ms. Carter,

My name is Deborah Febish I am a Traditional Naturopathic Doctor. I have worked in the natural field for 30 years. I am a pioneer in working with Medical Doctors to help patients to learn how to help themselves and their families maintain good health. I have seen over 4,000 people and either I have helped them or I have not, but I have never hurt anyone with my advice. Natural remedies go with exercise and diet to balance the individual body. Natural health is a responsibility of the person to take time to investigate their health. I have owned six health food stores and my responsibility to the public was to educate them with research material. And find supplements for the public that are safe and effective.

This Bill is restrictive of these stores and the individuals who are Traditional Naturopaths. This group wishes to take the title of Naturopathic Doctor away from individuals who have dedicated their lives to helping people stay healthy and work as consultants to medical professionals. They say we do not deserve to work with medical professionals because we do not come from their schools.

I was educated in Washington DC at the Advanced Integrative Institute. We were trained to work along side MD's from all over the world, I trained with MD's from Johns Hopkins UNV. In DC in the year 2000 we were licensed under the board of nursing. This gave us the ability to work along side the medical field. I do not know who this group of Naturopaths will be license under. I think they need to look at this Bill closely and sit with the group of Naturopaths who have been working in the Traditional field for the past 30 years and obtain recognition from the medical establishment as I have for the past 25 years.

My work is my passion not for profit. I educate people on their health and I am a consultant to a prominent doctor in Richmond. I work along side Dr. John Verheul, MD, MPH HealthvisionsMD. If you would like to see my Bio you can go to HealthvisionsMD look under "Providers". I work with Dr. Cynthia Bettinger, MD and Sheri Payne Tignor, C-FNP. I have supported Dr. Verheul in opening a practice to integrate the Natural and Conventional medicine. We have made great advancements in the past three years. I am an licensed ordained Minister a Pastoral Counselor.

I wish to see Naturopaths working along side the MD's helping people. There is room for everyone. In the Medical field the doctors become MD's and then go to a speciality fields. There is room for ND's to be just teachers, counselors and store owners. Why should there be a demanded license for the Traditional Naturopaths who under the constitution of 1950 stated we did not have to be license in this country as we do no harm.

In closing I would like to see the Naturopaths who want to be licensed to work in hospitals and with doctors, come up with a license that would not make them the only resource to the public in natural healing. The Lord is the great healer. We just help guide his people with food. It is up to them to take the responsibility to learn how to take care of themselves. Its about the people, passion not profit.

With great respect,  
Blessings,

Deborah Febish, Pastor, ND, MH, CIR

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August 12, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Carolyn Wolfe. I am a license marriage and family therapist who has coordinated with naturopathic doctors in both my professional and personal life over the past decade. I am writing in support of full licensing medically-trained naturopathic doctors. I wish to continue successfully coordinating with naturopathic doctors. The current lack of official licensure is a barrier to the safety and ease of these interventions. Knowing a regulating board was overseeing the qualifications and practice of naturopathic doctors not only provides peace of mind, it ensures the safety of my clients. Having seen and experienced the offerings of naturopathic doctors I can attest to the unique and valuable skills they bring to their work and the specialized training they pursue in addition to the requirements necessary to pass medical board exams. Their perspective and specialized training are not being utilized to the fullest during the current medical, national crisis because of the lack of validation of their skill set.

At this time, my understanding and opinion is that licensing is appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Carolyn S Wolfe, LMFT, LLC

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On Thu, Aug 13, 2020 at 11:04 AM Niranjan Dinesh <[ND.DC@outlook.com](mailto:ND.DC@outlook.com)> wrote:

Hello,

I am writing in regards to my support of Naturopathic Medicine, and asking for yours as well in making the licensure of it a reality in Virginia. The Naturopaths I have consulted in my life have provided an excellent complement to the traditional doctors I have seen, for a variety of health issues I have had. I would like for more people to experience the style of medical care that I have received, so I am again asking for your support in this matter.

Regards,

Niranjan Dinesh

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August 13, 2020

Dear Members of the Committee,

My name is Robert Ciprian, DC, DIBAK. I have been a District of Columbia resident for five years and I have been under the care of a naturopathic doctor for over four years in DC and over 15 years previously in Oregon. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors. I have benefitted from medically-trained naturopathic doctor care and I will continue to use them as my primary care providers. Along with their standard medicinal training, they are also very well trained and aware of lifestyle, environmental, nutritional, and mental causes of ill health and in turn are well trained to offer solutions to these issues that conventional medical professionals do not embrace. As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have.

Scope of practice in Virginia. Medically trained naturopathic doctors are not allowed to offer exams, to do labs or other testing. They are not allowed to diagnose conditions for my medical records and I have to go to a conventional medical profession who I would not go to for the type of care I am seeking in the first place. From their education and training, medically trained naturopathic doctors are trained to do all of this and form personal experience are much better at finding problems that may not be picked up by conventionally trained medical professionals.

Licensing medically-trained naturopathic doctors will provide much needed, safe healthcare access for the patients most in need. We are in a crisis in this country because the general primary practice medical practitioner is becoming a thing of the past. Medically trained naturopathic doctors are a wonderful source to fill this upcoming void in healthcare. And with our current pandemic, there is no better time to have medically trained naturopathic doctors on the front line in primary care to help the public with testing and care.

During twenty years of experience as a doctor of chiropractic, I have witnessed first hand the knowledge, skills and capacity of medically trained naturopathic doctors to not only work effectively within the current healthcare model, but to offer important and lacking options for treatment of individuals who are not served by this model. I trust their work and effectively collaborate with them in the most complex of cases because we are complementary providers and this is what good health care is all about. I do urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Robert Ciprian, DC, DIBAK  
Washington, DC

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charm city natural health

Tuesday, August 11, 2020

My name is Carrie Runde and I am a naturopathic doctor (ND) practicing in Baltimore. I hold licenses to practice naturopathic medicine in Maryland and Washington DC. I have worked in a variety of outpatient settings, including large integrative practices with primary care providers, medical specialists, counselors, nutritionists, acupuncturists, massage therapists, and chiropractors. Formerly, I served on the Board of the American Association of Naturopathic Physicians and was the Vice President of the Maryland Naturopathic Doctors Association. I was highly involved in the licensure process in the state of Maryland, which started 10 years ago. I was a participant throughout the pre-licensure and summer study process, licensure process, writing regulations, and finally in advisory and regulatory roles.

Maryland passed its ND licensure law in 2014 and began issuing licenses in 2016. One of the most important reasons was public safety. Without licensure and a set scope of practice in Maryland, there were vast differences in the level of medical training among people advertising themselves using naturopathic titles. This was a significant issue for patients new to naturopathic care as well as for patients who moved to Maryland from another state where regulation existed. The licensure of NDs in Maryland is working well. It has benefitted the public by providing clarity around the training and role of NDs so they know what to expect when they come to our offices. It has benefitted the healthcare system by providing a clear and legitimate path for other healthcare providers to confidently refer for naturopathic care, which they do regularly to my practice.

NDs have a unique skill set that is in-demand. We are trained as a bridge between conventional medicine and "alternative/holistic" medicine, with the ability to appropriately use lifestyle and natural medicines to treat health conditions within the context of someone's overall health, including conventional treatment. These skills are particularly necessary for chronic disease management. Patients are searching the internet for local doctors who are trained in "integrative/holistic/alternative" medicine to treat their chronic conditions like allergies, irritable bowel, and hypertension, just to give a few examples. Without regulation, these patients could see providers who have the same exact public-facing name, but who have vastly different levels of training (16 weeks of online, non-accredited courses vs 4 years of in-person, accredited medical training). This is a public safety issue.

4800 Roland Avenue, Suite 201, Baltimore, MD 21210 P: 443.835.1268 F: 844.654.7169  
info@charmcitynaturalhealth.com www.charmcitynaturalhealth.com

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August 12, 2020

Dear Members of the Committee,

My name is Ekaterina Khoreva, I have been a Virginia resident for \_10\_ years and I have been under the care of a naturopathic doctor for over 4 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

I have been suffering from back pain my whole life. Naturopathy and Acupuncture are the only measures that work to maintain my condition under control. In addition, my overall immune system support is coming from supplements and linctures from my Naturopathic doctor. There is a lot of value in preventative measures.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria. **[choose a few of the criteria below to focus on, and personalize as much as possible].**

- 1) I would like to enjoy naturopathy and be confident that my doctor is medically-trained. I would not want a person without a license to be able to treat me in the state of Virginia. Naturopathy takes a special place in my heart and I believe that in combination with medical training, great results can be obtained.
- 2) I currently do not have a primary care provider and would like my medically-trained naturopathic doctor to be able to do a physical exam and refer me to other specialists if needed. I do not want to seek another primary care provider. I would prefer my medically-trained naturopath to treat me.
- 3) I would like to be able to use my health insurance at the office of my Naturopath. I am paying every month for the health insurance that I don't get to use.
- 4) There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient and a consumer, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Ekaterina Khoreva  
Alexandria, VA

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charm city natural health

Now with regulation in Maryland, we can make sure that people using naturopathic titles have a standardized training and defined scope. We have the framework to regulate the profession, take disciplinary actions, all of which are beneficial for the public and the healthcare system. There is less confusion about what NDs do and where we fit into the existing health care system.

Medically-trained NDs need a defined scope of practice in order to serve patients and help the healthcare system. Without it, we can not perform physical examination, order diagnostic labs or imaging, or make disease-specific treatment recommendations. There are no alternatives to regulation that would solve this fundamental problem. Having a license in Maryland has allowed the NDs to use a fuller scope of our medical training, which helps patients and decreases duplicative care and costs. For example, before having a license, I would have to send a patient to another provider to get labs performed. This was inefficient, slowed down the patient's workup, and added unnecessary costs due to additional provider visits.

I would also like to clarify that, in Maryland, NDs are trained and independent to work independently in practice. We work autonomously, as in all of the other licensed jurisdictions. We are trained to operate within the existing healthcare system and know when to refer to medical specialists and other providers. In Maryland we have a very unique "Collaboration Agreement" with a conventional medical physician. An ND must list an MD or DO who is willing to serve as a clinical resource. It is not supervision. It is simply an MD/DO who is willing to give his or her contact information for as-needed consultation. The consulted MD/DO does not direct patient care or engage directly in the care of the patient. There are no requirements around how often an ND must consult with the MD/DO or if they have to at all.

Finally, Virginians are seeking naturopathic medical care. I know this because they travel to my practice in Baltimore because I have a license and my role is clear. However, these patients would be better served seeing a local ND in Virginia, where there are now over 40 medically trained, potentially licensable, naturopathic doctors.

Carrie Runde, ND

4800 Roland Avenue, Suite 201, Baltimore, MD 21210 P: 443.835.1268 F: 844.654.7169  
info@charmcitynaturalhealth.com www.charmcitynaturalhealth.com

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On Thu, Aug 13, 2020 at 8:51 PM chris link <udeservmassage@gmail.com> wrote:  
Dear Members of the Committee,

My name is Christopher Link, I have been a Virginia resident for over 20 years. I am a Massage Therapist and I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

As a Licensed Massage Therapist in VA for the last 16 years, I have seen the standards of my industry become more consistent and have enjoyed the benefits that my license personally and professionally affords me. A well-defined scope of practice, standards of conduct, etc would greatly benefit the naturopathic doctors and their patients as it has done for the massage practitioners and their clients. For the naturopathic doctors I have used, met, and witnessed my clients using, to not be given the tools from the commonwealth do do their jobs to best of the scope they have been medically-trained to do is a misstep and a shame. I have met and worked with naturopathic doctors who are frustrated to have to hold a license in a nearby state when the commonwealth should be fostering their skill-sets and allowing them to work from their home base(s) in VA.

These doctors want to give great care, take the load off of the sometimes overburdened medical facilities and traditionally accepted doctors, and happily pay VA to be licensed. Not being allowed to do physical exams, run blood labs, give diagnoses, or otherwise properly legally conduct their medical skills is really quite sad. The NDs should be considered a medical asset! For VA to not be supporting this community with proper licensing is allowing other states to receive money that should otherwise be circulated to and through VA.

As a patient and consumer, I want to know that when I see a Naturopathic Doctor in VA, certain standards are being adhered to. Until recently, I was unaware that NDs I had seen in VA in the past were UNLICENSED! They were good doctors, I respected them, I am glad to have seen them. Had I known that VA did not license them and demand they adhere to VA standards, I likely would not have gone to see them. I can now understand why so few are in my area and why they are so expensive to see despite giving me better care than my general practitioner.

Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Christopher Link LMT  
Fairfax County, VA

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On Thu, Aug 13, 2020 at 9:00 PM Heather Joseph <heather@radiantwellnessva.com> wrote:

Hi Dr. Carter,

It is vital that exception language that protect unlicensed workers be included in the law.

I have had naturopathic doctors as part of my own healing process and it has been important to have their services. However, I have seen even more unlicensed wellness providers over the years as part of my healing journey and they have been equally, and in most cases even more, essential to my healing journey.

Also, over the years I became one of those unlicensed wellness providers because of the impact a variety of modalities had on my own health and that of my family. While it is my livelihood, what feels even more important is that ALL providers are part of an equation. There is no silver bullet and it is important for people to be able to customize their healing to meet their own individual needs by having a variety of modalities and providers available.

Thank you immensely for this opportunity to express and to be heard.

Sincerely,

Heather Joseph, EEM-AP

Heather Joseph

Radiant Wellness

804-339-0316

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August 12, 2020

To Whom It May Concern,

I'm writing a letter of support for the licensure of Naturopathic Doctors in the state of Virginia based on the Board of Health Professions' criteria. As a patient of a naturopathic doctor, I will speak to the value and community need for having NDs regulated.

Perhaps most important, NDs provide services that patients do not find in conventional medicine. NDs are interested in how and why illness occurs with the goal to restore health by addressing the root causes of disease with a treatment plan personalized for each individual. They are often focus on preventive care and are willing to try botanical and/or nutritional solutions to solve a wide array of problems. For example, my daughter is a competitive athlete and needed help regulating her hormones. The only solution given to me through conventional medicine was the birth control pill. Birth control pills give a range of side-effects including weight gain, which would have been problematic for my daughter. Instead, my naturopathic doctor was able to regulate and fix my daughter's hormonal problems within a few months only using nutritional supplements and herbal remedies with no side-effects.

Personally, I know that NDs are far more knowledgeable when it comes to nutrition. Conventional doctors have limited to no education in this area. In addition, conventional doctors focus on a single condition rather than consider the entire body. However, NDs consider the patient's lifestyle and the biochemical factors underlying their problems. They consider how the physical, mental, social, emotional, and environmental influences might be working (or not working) together. In fact, NDs spend a lot of time assessing these factors from the start (a first visit can take up to 2+ hours). And the natural health treatments often incorporate diet, meditation, exercise, nutritional supplements, and herbal treatments.

In my personal experience, this is also what limits a conventional doctor's understanding of women's hormones. Conventional medicine relies on a few tricks: birth control pills, hormone replacement, or strong prescription medications (often with a host of side-effects). However, many of these remedies have shown to be ineffective as well as have long-term health consequences.

Unfortunately, the NDs are limited in their scope of practice. They cannot do physical exams, imaging or lab-work. Therefore, patients and NDs must outsource this work – which also delays the timing of the reports. It is also more costly for the patients. And it makes simple follow-up tests less likely.

The economic impact of licensing NDs could be huge and might one day allow everyone access to their services; currently, NDs can only help people who can afford the out-of-pocket expenses. Individuals, families, and businesses are continuing to face mounting healthcare costs. The number one expenditure as we age is healthcare expenses. With proper naturopathic care and interventions, as get older we could avoid many of the expensive procedures and life-long prescription medicines. This would allow for conventional doctors to focus and treat the more acute conditions; perhaps even in conjunction with NDs like they do in other states. Our healthcare system is struggling – and given our growing

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understanding of epigenetics – the conditions people are facing are unique and do not have a one size fits all solution. Our current COVID crisis is evidence of this. We need to find ways to support our doctors, all of our doctors – bringing as many tools to the table as possible.

As an educator and member of our Virginia community, I value the educational requirements for accreditation to ensure adequate training and licensing exams. While I am in strong support of seeing the profession of NDs grow and expand, it is imperative that all professions have oversight and supervision; allowing for consistency and promoting ongoing safety and accountability.

Therefore, I am in support for the licensure of Naturopathic Doctors in the state of Virginia.

Thank you for your time,

Katherine Guthrie-Sokolowsky, PhD  
Professor of Finance  
William & Mary

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On Thu, Aug 13, 2020 at 10:09 PM Tommie Lee Washington III  
<tommieleewashington@gmail.com> wrote:  
Hello Elizabeth,

I am writing to ask you to support naturopathic medicine in Virginia. It has helped my wife and I beat cancer and other health issues.

I pray that you and your colleagues will choose to acknowledge that the things that God made are the best medicine we have available.

Thanks,  
Tommie

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support, means that patients are now requiring more access to providers who are well-trained to provide medical services.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Tammy M. Ewen  
Daleville, VA

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August 14, 2020

Dear Members of the Committee,

My name is Tammy Ewen. I have been a Virginia resident for 53 years and I have been under the care of a naturopathic doctor for the past 9 months. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

My experience working with my naturopathic doctor has been overwhelmingly positive. I was given time to provide a full background, including life circumstances that have affected my health. This provided an opportunity previously unavailable to me with my regular GP who is only able to give me 15 minutes to get to the bottom of my issues. My naturopathic doctor is not merely treating symptoms, but seeking to determine and treat the root cause of my health issues.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Specialized skills.** Naturopathic doctors consider the patient's health holistically. This approach has been a huge improvement in the care I was receiving from my GP. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. While many of the healthcare services that NDs are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that aren't included or emphasized in other practices.

**2) Autonomous practice.** Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medical providers do not have the same training and knowledge in both conventional and natural medicine. I also trust my ND to refer me to a specialist or another healthcare provider, in order to ensure the best care possible.

**3) Scope of practice.** Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. They are not allowed by law to give a medical diagnosis for my medical records, and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from an ND. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments which is an added cost to my already substantial medical bills. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic, especially for mental health

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Misra Chiropractic Clinic at The OM Center  
Bibhu R. Misra, D.C., M.Sc., Dr. Hannibal Hervey, DC

August 14th, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of Naturopathic Doctors. My name is Dr. Hannibal Hervey, and I have been practicing chiropractic medicine for over 9 years. I am Board Certified Chiropractor. I attended National University of Health Sciences with overlapping core classes that were required by the Naturopathic program. I have also worked with several professionally and referred patients over the past few years. Rather than just suppressing symptoms, Naturopathic Doctors work to identify underlying causes of illness, and develop personalized treatment plans to address them. Their therapeutic approach identifies the natural order in which all therapies should be applied to provide the greatest benefit with the least potential for damage. I have found medically-trained naturopathic doctors to be crucial in the conservative care model. Primary care Physicians (PCPs) agree that people are over medicated and obesity is on the rise. Naturopathy is a crucial piece to this puzzle of health care and I have seen providers take the time to review health histories and underlying environmental factors in patients in order to assist the patient in achieving health goals.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while also promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical

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Misra Chiropractic Clinic at The OM Center  
Bibhu R. Misra, D.C., M.Sc., Dr. Hannibal Hervey, DC



Misra Chiropractic Clinic at The OM Center  
Bibhu R. Misra, D.C., M.Sc., Dr. Hannibal Hervey, DC

professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.

- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.
- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available

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care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.

- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe health care access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Dr. Hannibal Hervey, D.C.  
The OM Center

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On Fri, Aug 14, 2020 at 10:23 AM Ben Wilke <[rwilke@ndnet.ccnm.edu](mailto:rwilke@ndnet.ccnm.edu)> wrote:  
Greetings Dr. Elizabeth Carter,

I am a Virginia citizen, born and raised in Williamsburg, and going to school at CCNM. I am wondering if it is necessary to outreach for comments from the general public to the BHP. I know a lot of people in Blacksburg, VA that are environmental and social activist and would probably contribute greatly. I was an organic farmer in Blacksburg for 5 years and graduated from Virginia Tech prior to that.

If so, does a template exist for Virginia citizens that want higher quality Naturopathic Medicine? And what address would you like these letters funneled to?

Thank you for your work!

Ben Wilke  
Naturopathic Student  
Yoga Awareness Teacher  
647-676-2183

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August 14, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Ben Wilke, and I am a 2<sup>nd</sup> year student at the Canadian College of Naturopathic Medicine (CCNM). I am writing to urge the Board to recommend licensure for medically-trained naturopathic doctors.

I was born and raised in Williamsburg VA and graduated with a Bachelor of Science degree from Virginia Tech in Biological Systems Engineering. My passion afterwards was to discover how I could help make changes in the professional landscape so that citizens could more easily support their own health, as well as environmental, as a part of their daily consuming habits. This was practically applied by through design and application of sustainable agricultural systems. However, there was not enough financial support to continue this venture, so Naturopathic Medicine was the next step up for me. I built strong bonds in the local community of Blacksburg, VA while I was a farmer there. Most recently I got a comment from a past dedicated customer, who has young children and is also actively involved in the community, "I see the need for a naturopathic doctor in Blacksburg. Are you coming back to fill the void? The one I saw outside of town was not so helpful. The need for quality is here."

I feel that this comment accurately expresses the need for more professional recognition of the quality of health care that exist within the Naturopathic Profession. This thought, I imagine, lay dormant in the minds of many Virginia citizens seeking a health care that allows them to talk about their health concerns for more than 10 minutes with a scientifically trained and licensed health care practitioner. It should come to no surprise to any trained medical clinician that oversight and guided treatment of an individual's imbalanced emotional response to stressors in life can have a profound impact on their capacity to develop illness or even manage current chronic states of disease. Simply said, an individual that has confidence in their daily lifestyle habits as being healthful and supportive of their life will have a lesser risk of becoming ill. This has been well recorded in the study and practice of orthomolecular psychiatry and needs to be recognized as a viable practice that reduces the load for Medical Doctors (MD) and Doctors of Osteopathy (DO) attempting to decode chronic illness in short visits that need to be addressed via a well-established therapeutic relationship.

The ability for a patient to engage in a therapeutic relationship with a licensed Naturopathic Doctor will, hands down, reduce health care cost and increase revenue by keeping people with chronic conditions (no matter at onset or thereafter) out of hospitals and more effective in the work place. We will see a reduction in obesity, heart disease, chronic pain, addiction, digestive disorders, allergies, psoriasis, infertility, and relapses of cancer and Lyme disease. We will see people being more immune to mutations of viruses and bacteria. This can all be achieved under the supervision of a Naturopathic Doctor, working in conjunction with MD's and DO's if need be, that is allowed to apply their astute knowledge in biochemistry, physiology, nutrition, botanical medicine, diagnostics, and psychiatry. Naturopathic Doctors are trained to understand

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the human condition at a personal level and this personal engagement with patients is what the current medical landscape is lacking. My own inability to connect with conventional doctors about my own disorder is why I was inspired to join the Naturopathic Medicine. As a result my own conditions are under control and no longer interfering with my mental capacity to engage with the work I do.

So it is harmful and a breach in public safety for the citizens of Virginia to not have access to this and be confused about how to find it. It may not be apparent that health providers currently practicing some inadequate form of Naturopathy are causing direct harm to the public. This is concretely because the harm is indirect. The further development of a patient's onset of a chronic condition will more subtly get worse and they will most often blame it on their own behavior or habits. The inadequate practitioner of naturopathy is deemed a "quack" or simply not helpful and the profession is handicapped as a result. Akin to an athlete breaking their leg because they were forced to perform on an improperly managed playing field, and now has to expend all energy in rebuilding their own capacity to perform. We are expending energy on fixing a brokenness in our practice that is present because inadequacy is allowed.

Licensed Naturopathic Doctors, who truly want to be a team player, need other health care professionals to recognize the importance of this niche that the Naturopathic Doctors fill. We need you to take a moment, look beyond the aspect of competition, and find the place in your own internal self that believes, "When I take care of myself, I feel better". The nuanced effect of Naturopathic Medicine integrated in public health is beyond the notion of lifestyle management, as I hope is articulated in the scope we wish to operate, but it is this very node of intuition that Naturopathic Medicine pins down and strengthens in the patient so they are less apt to make choices in their unique life circumstances that are degrading to their physiological system.

It is key that licensing and appropriate scope of practice be moved forward on as soon as possible so that Virginia can stay on the front line of an evolving health care system. Without your capitalization on the unfilled areas of health care I elucidated on they will continue to be occupied by subpar versions of who we are. Virginia will inevitably fall behind in the quality of health care that it provides because of this, and the negative impact on public safety and state revenue will be entirely implicated. I, respectively, implore you to let go of and see beyond the unjustified criticism placed on modern day Naturopathic Medicine that has emerged because of the freedom for inadequately trained people to practice exists. Please shake the hand of the Naturopathic Doctor that wants to be licensed, regulated and aid in increasing the quality health care that currently exist, we all know that these chronic conditions are on the incline. We absolutely can and want to help!

Sincerely,

Ben Wilke  
Naturopathic Student  
Canadian College of Naturopathic Medicine  
rwilke@ndnet.ccnm.edu

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run into hundreds of dollars for me. I already pay over \$1,600 a month for health insurance, so licensing medically-trained naturopaths would allow me to access the coverage that I am already having to pay for.

**3) Alternatives to regulation**-There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient and a consumer, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities. My choice of healthcare and where I receive it should be just that and not be restricted by a "list" that my insurance company deems worthy of treating me.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Kind regards,  
Shona P. Freeman  
Chesterfield, Virginia

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August 14, 2020

Dear Members of the Committee,

My name is Shona Freeman, I have been a Virginia resident for over 50 years and I have been under the care of a naturopathic doctor for over 7 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

The personalized care that I have received from my naturopath has been priceless. I am not on a conveyor belt passing through a doctor's office and having medication thrown at me to treat symptoms. My naturopath listens to me and strives to get to the root of my concerns. She takes time with me and doesn't rush through our appointment to get to the next patient. I believe this personalized care has been paramount to my wellness journey. Not just my physical journey, but also my mental journey, as I feel like I am being heard.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

- 1) Autonomous Practice**-Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and knowledge in both conventional and natural medicine. I also trust my ND to refer me to a specialist or another healthcare provider, in order to ensure the best care possible. She has done this by recommending me to an Endocrinologist. This gives me additional confidence in being her patient.
- 2) Economic impact**-Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access to the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide. Because of the lack of licensing, I am having to pay out of pocket for every lab that I have done. This has

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Natural Integrative Healthcare

August 14, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Patricia Diefenbach, and I have been a naturopathic doctor since 2014. I was the President of VAANP from 2016-2019 and am well aware of the advantages, disadvantages and pitfalls surrounding the entire licensing issue. I am writing in support of full licensing medically-trained naturopathic doctors.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) Risk of harm.** Many medical professionals and jurisdictions as well as the general public do not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath.

*For example, in 2017, as the President of the Virginia Association of Naturopathic Physicians, I was subpoenaed by the legal counsel of Michael Courtright, a medically trained and Vermont licensed ND, to be an expert witness at his trial scheduled for Monday, Oct. 30, 2017 in Virginia Beach. At that time the Commonwealth Attorney's expert witness was, Ms. Erica Steele, a lay naturopath.*

Licensure, and a regulatory framework, will provide clarity – while also promoting safety and access to patient-selected care. All medically-trained professionals should be held accountable by a regulatory board for the safety of patients. Medically-trained naturopathic doctors are seeking accountability for their healthcare field.

- 2) Specialized skill and training.** Naturopathic medical education is specialized training, and it goes far beyond the training of lay naturopaths. Schools are 4-years, in residence programs, with over 4,100 hours of training, including at least 1,200 clinical hours with direct patient contact. ND medical students also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine and they are experts in their field related to natural therapies; they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.
- 3) Autonomous practice.** Naturopathic doctors practice independently in all of the twenty-five regulated U.S. jurisdictions, and they collaborate with other medical professionals in ALL jurisdictions. Naturopathic doctors know when to refer.
- 4) Scope of practice.** Naturopathic doctors are trained as primary care providers; their training justifies a broad scope which varies from state to state. They work collaboratively to serve as another safety net provider for the public. With the current pandemic resources still limited, trained medical professionals are critical to our public health system.

Natural Integrative Healthcare | Patricia L. Diefenbach, ND, MS, CNS® CPT | Naturopathic Physician  
Dr.Patricia@Naturalintegrativehealthcare.com | Phone: (703) 609-8717

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- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and bringing revenue to Virginia. For example, during my term as President of VAANP, I received multiple queries from students graduating from naturopathic medical schools approved by the US Department of Education, who wanted to return to their home towns and serve their communities in the Commonwealth. Due to the lack of licensing available in Virginia, they have established their practices in other states. Similarly, there are several medically trained NDs with thriving practices, who live in Virginia but who commute to the District of Columbia, where NDs are licensed.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. *Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths.*

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,



Patricia Diefenbach, ND, MS, CNS, CPT

Natural Integrative Healthcare | Patricia L. Diefenbach, ND, MS, CNS® CPT | Naturopathic Physician  
Dr.Patricia@NaturalIntegrativehealthcare.com | Phone: (703) 609-8717

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On Fri, Aug 14, 2020 at 2:21 PM Tatiana Argeiro <taquila@gmail.com> wrote:

Dr, Elizabeth Carter,

My name is Tatiana Argeiro and I am writing this letter to support the licensing of Naturopathic Doctors.

Naturopathic doctors have a unique set of skills and therapies that makes their discipline holistic and reparative. They look at the whole picture to help each person and family systems. As an example, I would like to share a little bit of my family's experience being treated by our naturopathic doctor. Our naturopathic practitioner has been addressing issues with the four of us (two adults and two children) that no other MD was able to. I was put in remission of my autoimmune and haven't been taking ANY medications thanks to my naturopathic protocol. My biggest concern and obstacle is that every time we need to see how my CPKs are doing and how my inflammation markers are behaving I have to schedule an appointment with a rheumatologist only for his ability to run my labs. I pay for an extra appointment for something my naturopathic doctor should be able to do herself. I feel I am not being fair to the doctor who is NOT treating me but only running labs and I feel my naturopathic doctor is taking longer to help me because she needs to wait for my tests from a different MD. It is not efficient and has the ability to stall my progress and healing.

My children's' conditions were also highly improved by their naturopathic protocol. My son has PANDAS and NO pediatrician gave me ANY solution until I started with my naturopathic practitioner. My daughter's anxiety, ADD and overall health was also not efficiently addressed by pediatricians of all sorts and practices and she feels way better on her naturopathic protocol.

I also believe their practice should be licensed so I can safely recommend their services to my friends, many of who are not finding relief from their MDs and are in search of more modern and humanized options. Without licensure, we may risk being in wrong hands where lay providers can be confused with naturopathic doctors. Thank you for your consideration and I urge the Board to vote in favor of a recommendation for licensure.

Best Regards,

Tatiana Argeiro

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On Fri, Aug 14, 2020 at 3:41 PM James Ringgold <jringgold@me.com> wrote:  
August 14, 2020

Dear Members of the Committee,

My name is Judy Ringgold. I have been a resident of Virginia for over 50 years and have been under the care of a Naturopathic Doctor for approximately 2 months but have been a seeker of naturopathic healing in different forms for probably 20 years. I am writing in support of the recommendation for licensure for medically-trained naturopathic doctors. In my instance, I believe that my health is better served by a professional that would integrate the healing power of nature, identify causes and look further than strictly symptoms. The benefits for me, personally, have been tremendous.

Yes, I am a patient who supports licensure and, as it relates to some of the criteria, here are my thoughts:

I would like for my choice of Naturopathic Doctor to be licensed, having gone to medical school, and for me to be covered in case of harm. They should be disciplined by a regulatory board and have their licenses restricted if it ever got to that point, just as in a traditional licensed medical field.

I, personally, have found that my own body responds better to natural medicine as opposed to prescription drugs. My naturopath bridges that gap for me but, if my naturopath did have specific education in certain areas, I would much rather have the choice of that approach.

I also feel that alternatives to regulation, as opposed to licensing, would not serve the greater purpose. I want access to safe, holistic care that is best for me, a choice made by me, and regulated.

I respectfully urge the Board to recommend licensure for Naturopathic Doctors in Virginia.

Sincerely,

Judy Ringgold  
Powhatan, VA

Sent from my iPad

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----- Forwarded message -----

From: **john saunders** <JohnHenry74@msn.com>  
Date: Fri, Aug 14, 2020 at 3:58 PM  
Subject: Naturopathic Doctors  
To: [elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)  
To Whom it May Concern

Re: Licensing of Naturopathic Doctors

The Commonwealth of Virginia's consideration of the licensing of Naturopathic Doctors is long overdue, in my view. Although I am not an advocate of licensing regulation for every field of employment, the protection of the public is a paramount concern in the fields of medicine and health care.

Here are three reasons for implementing ND licensing requirements:

**Patient identification of qualified NDs**

Beginning about five years ago, I have received health care support from an ND in the Richmond area. The experience has been remarkably beneficial both in receiving remediation of illness and in guidance for a healthy and improved quality of life. Notwithstanding, the experience has not been without unnecessary complexity and frustration.

When I first considered the services of a naturopathic doctor, the process of identifying a qualified practitioner was frustrating because there are no clear standards for separating lay healers or lay naturopaths from the real thing. An inordinate amount of time was required to research the industry and universities to make a selection with confidence. If they were a regulated group, the process would be simpler because of a licensing credential. This is especially important since many of us seek a doctor when we are sick and suffering. It's not a time when you want to spend hours on research to find a qualified doctor.

**Unique skill sets of NDs**

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My initial contact with my naturopathic doctor was the result of a debilitating and maddeningly painful autoimmune disorder. I had consulted with four MD's and not one was able to make a diagnosis. Three of the four MD's were competent and trusted medical professionals. But because of the particular scope of their training, and the difficulty inherent in diagnosing my illness, they could only scratch their heads and continue to refer me to another doctor.

I could not work, I could hardly eat and lost much weight, and worst of all I suffered the most excruciating pain constantly. I was desperate for a diagnosis so I'd have a treatment plan. Finally, at my wife's repeated urging I was able to gain an appointment with a naturopathic doctor.

Within the first hour of my two-hour appointment my naturopathic doctor was suspicious of the possible diagnosis. Because she could not diagnose me in the State of Virginia and no other doctor was able to provide me with a diagnosis- I found myself in a bit of a quandary. (By the way, I've never in my life had an opportunity to spend one or two hours with a doctor. It is a wonderful experience to have a doctor patiently listen to your experience and to consider you as a whole person and not just a set of symptoms.). But because naturopathic doctors are trained to look at the cause and improve general health to restore function- she was still able to craft a plan to work on lifestyle, inflammation and manage my pain. Through this my health was restored.

There is no doubt that it was the unique training of my naturopathic doctor and her experience that enabled her to put a concentrated plan together to put me back together. No one else was able to do this for me.

#### Authority to practice as other medical professionals

An impediment to receiving prompt treatment at minimal expense is the constraints placed on Virginia NDs because of a lack of state regulation. I have often had to incur additional expense of money and time because something was needed that my naturopathic doctor could not do in Virginia. For example, the prohibitions against

physical examinations, lab tests and imaging. These restrictions hinder my doctor in the provision of care when I am ill, and they place an unfair burden on the patient.

Thank you for considering my input.  
John Henry Saunders

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From: BRIGITTE J DU PUY-LEWIS <dupuywoodles@gmail.com>  
Date: Fri, Aug 14, 2020 at 4:43 PM  
Subject: Support letter for licensure  
To: <elizabeth.carter@dhp.virginia.gov>

Letter of support

August 14, 2020

Dear Members of the Committee,

My name is Brigitte du Puy-Lewis. I have been a Virginia resident for 25 years and I have been under the care of a naturopathic doctor for over 4 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

The support received until now help me a lot where I cannot find any improvement with the conventional way. I think both are very important for the healthcare access for the patients.

As a patient who supports licensure for medically-trained naturopathic doctors, here are few concerns I have.

Specialized skills: naturopathic doctors consider the patient's health holistically. They are only medical providers specialized in drug-herb and drug-nutrient interactions. They help bridge the gap that exists between conventional and traditional medicine practice. ND are trained to provide and share with other medical professions. I personally experimented this a number of times. Also ND have specific education in certain areas that are not in other practices. They provided relief where the conventional medicine could not.

Autonomous practice: I see my ND because other medically providers do not have the same training and knowledge in both conventional and natural medicine. I also trust my ND to refer me to a specialist or another provider to ensure my best care possible. This happens twice this year.

Scope of practice: ND cannot offer physical exams or order labs or imaging. They cannot even test for COVID-19 or run a basic complete blood count. They are not allow by law to give a medical diagnosis for my medical records and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from my ND. This will eliminate the need for added appointments. Many primary care providers are retiring and this is increasing the shortage of primary care providers. This combined with the increasing needs of the public during the pandemic means that patients are now requiring more access to providers who are well-trained to provide medical services.

Economic impact: licensing would pave the road to insurance coverage. Currently ND are unable to use proper coding that would enable insurance coverage so needed. In the era of chronic disease it is particularly a burden.

Alternatives to regulation: as a patient and a consumer I want access to safe, regulated and holistic care that best aligns with my health needs and priorities.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Brigitte du Puy-Lewis  
Warsaw, VA

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On Sat, Aug 15, 2020 at 11:12 AM Martha Cummings <martha-cummings@att.net> wrote:

August 15, 2020

Dr. Elizabeth Carter

Virginia Board of Health Professions

9960 Mayland Drive, Suite 300

Henrico, VA 23233

Dear Dr. Carter,

Having lived in Virginia since 1975 and having been under the care of a Virginia naturopathic doctor since 2014, I strongly recommend that medically trained naturopathic doctors become licensed in the state of Virginia.

The main reasons I believe licensure for trained naturopathic doctors is important are the following:

1) Without licensure, anyone could call themselves a naturopathic doctor. For safety and well-being, all those who seek health care from a naturopath need to know their doctor is medically trained and legitimate. Imagine conventional medical doctors not being licensed. It's the unthinkable. Naturopathic doctors should be held to the same level of accountability and standards as other regulated health professionals which will only give confidence and security to the population at large.

2) Today more than ever, individuals are interested in forming a health care team that addresses health issues from BOTH a holistic and a conventional medicine perspective. Both are vital because they approach health care from different perspectives. Naturopathic doctors are trained in specific areas that other doctors are not. It becomes a complete health care package to have traditional medical doctors and a naturopathic doctor looking at the "whole self" from the outside in and the inside out.

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On Sat, Aug 15, 2020 at 6:34 PM <john.hanks77@gmail.com> wrote:

Licensure is not required for Naturopathic Doctors to work in Virginia today as long as they continue to work strictly with natural products and remedies. This is required today. The desire to be licensed is to allow them to perform some additional medical procedures, order certain tests and x-rays and most important, to bill insurance for their fees.

The only states where working in natural health, performing consultation on or providing suggestions for natural products and remedies is illegal are states where naturopathic doctors have been licensed and the legislation provides no exception for the existing natural health workers. **In other words, the law to license naturopathic doctors in some states is the very law that made the exact same things they did legally prior to licensure, illegal after licensure was granted.** It can create a monopoly for the few that are licensed while the competition is eliminated. At least eleven states have proactively had their legislators pass safe harbor laws to keep licensing laws from making their natural health activities illegal. And in at least two states, the Naturopathic Doctor organization pursuing licensure attempted to have these laws repealed after passage in their own efforts to become licensed themselves. We attempted to pass a Safe Harbor law in Virginia in 2006 and the same folks seeking licensure now stood against us then.

Some folks have insinuated that having naturopaths be licensed and 'regulating' natural health would somehow make the customers safer. That is a false argument. Herbs and natural remedies have been around for centuries and centuries. They were used by people in the bible and throughout history. Generations of Virginians have used and worked with natural health and continue today. And they are safely used by increasing numbers of people every day. They are available over the counter and are not unsafe.

There are concerns with licensing folks to be naturopathic doctors. There are clear established paths to become a medical doctor in Virginia. Licensure of Naturopaths would lower these existing standards. If someone wanted to become licensed under the requirements in the legislation as submitted, they would need to go to a school in Washington State, Canada or other location, not in Virginia. This seems to be a significant barrier to entry for most Virginians to achieve, and creates monopolistic control. Also, with an autonomous practice, a white coat, a stethoscope and the title Doctor, the public could be led to believe that these Naturopathic Doctors were actually MDs. Unless a person meets the established criteria to be an MD, maybe it would be more appropriate to have them work under the direction and supervision of an actual MD as they stated they have been required to do in other states.

But my biggest concern is that licensure could be granted without mandating exemptions and protection for the thousands of Virginians working legally in natural health in Virginia today. There are reportedly less than 50 people who are seeking licensure as naturopathic doctors in Virginia. Trinity School of Natural Health ( <https://www.trinityschool.org/> ) has graduated 151 Traditional Naturopathic Doctors (now called Certified Holistic Health Practitioner) and 458 Certified Natural Health Professionals in Virginia alone. This does not include any other schools' graduates, students currently enrolled in these programs but who have not yet completed, Health Coaches, or the many who have simply learned on the job working in

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3) Naturopaths are limited by law from executing basic services for patients such as physical exams, ordering labs or imaging, and running a basic complete blood count. For individuals who prefer to use a naturopathic doctor exclusively, this is quite unfortunate and it keeps patients running from doctor to doctor. Allowing naturopaths to offer these basic services would considerably cut costs for patients and better serve all Virginians by increasing legitimate access to other options.

I would briefly like to tell you an experience I had as an example of what a naturopath can do that some medical doctors are not able to do. Over a period of about 6 months I had some gut issues which consisted of a constant ache in my gut, loss of appetite and lethargy. Over that time period I consulted two different medical doctors, had two endoscopies and it was determined I had acute gastritis and gastro-esophageal reflux disease. I was told and I quote, "You'll probably have to stay on Prilosec for the rest of your life." With that information, I went directly to my medically trained naturopath and she was able to determine that the real problem was a histamine build up in my gut. I changed my diet, my gut gradually healed and I have not taken Prilosec since.

My heartfelt plea is that you and members of the Board will see an important need here and recommend licensure for naturopathic doctors in the state of Virginia.

Regards,

Martha H. Cummings

Mathews, VA

[martha-cummings@att.net](mailto:martha-cummings@att.net)

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the hundreds of herb shops and natural health stores around the state. Their livelihoods could be negatively impacted or their jobs eliminated. And they have done nothing wrong. Enforcement against Virginians working in natural health stores, a Mom and Pop family business or a consultant working from home would be relatively easy. However, it would be nearly impossible to stop the millions of articles available on the internet recommending natural health products, remedies, diet and nutrition.

I support the thousands of natural health workers in the state that simply want to keep their jobs, to keep helping customers and clients with suggestions for natural products and remedies. I do not believe natural products and remedies are unsafe (Criterion One). The FDA makes product safety a requirement of the manufacturers. And I do believe that licensure without protections could do irreparable financial harm to other Virginians and severely impact access to natural health products and suggestions by Virginians (Criterion Five). If you choose to recommend licensure of Naturopathic Doctors in Virginia, please also recommend exemptions and protections be included in the law to protect our citizens earning their living in the natural health world in Virginia.

Thanks,

John Hanks

Prince George, Va.

804-892-9886

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From: <john.hanks77@gmail.com>  
Date: Sat, Aug 15, 2020 at 6:36 PM  
Subject: Study for Licensure of Naturopathic Doctors  
To: <elizabeth.carter@dhp.virginia.gov>

In the state of Virginia, the licensure of Naturopaths has been studied over and over and nothing has changed. There is no risk of harm. These few people want to be licensed and create a monopoly in natural health.

“54.1-100 Regulation of professions and occupations.

The right of every person to engage in any lawful profession, trade or occupation of his choice is clearly protected by both the Constitution of the United States and the Constitution of the Commonwealth of Virginia. The Commonwealth cannot abridge such rights except as a reasonable exercise of its police powers when it is clearly found that such abridgement is necessary for the preservation of the health, safety and welfare of the public...

No regulation of a profession or occupation shall conflict with the Constitution of the United States, the Constitution of Virginia, the laws of the United States, or the laws of the Commonwealth of Virginia. Periodically and at least annually, all agencies regulating a profession shall review such regulations to ensure that no conflict exists.”

I don't support licensure, but if you choose to recommend licensure for these few people, there must be in the law exemptions or protection for the thousands of Virginians that have the right to work in these professions and keep the titles they worked for as they have in other states.

Thank you,  
Rebecca Hanks  
Prince George, Va.

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From: **Daniel Traas** <tonyatraas@gmail.com>  
Date: Sat, Aug 15, 2020 at 1:59 PM  
Subject: Public Comment Concerning Licensure of Naturopathic Doctors  
To: [elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov) <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

August 15, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors. My name is Dr. Tonya Noel Traas, and I have been a pharmacist in Virginia for over 19 years. I have held positions in hospital and community pharmacy, earning my 10 year certificate of service with Walmart this coming September. I also served as Director of Experiential Education at the Appalachian College of Pharmacy in 2008 and 2009. During my employment with the college, I worked with two naturopathic doctors. I also attended health coaching classes at Duke University in 2008 and 2009 where I interacted with medically trained naturopathic doctors. Through these experiences, I came to appreciate and understand the rigorous training required of them and their breadth of knowledge.

Prior to these experiences, my knowledge of naturopathic doctors was limited and, like many lay people, I did not understand the scope of their practice. During my training, in pharmacy school, I discounted naturopathy because most of those I encountered had earned a "doctor of naturopathy" degree through an unaccredited online diploma source. The practitioners I encountered in 2008 and 2009 were competent medical professionals who were residency trained to work both independently and in collaborative relationships with all medical providers.

Licensure would mark the necessary distinction between those who are actually medically trained as naturopathic doctors and those who earned their "degree" from an online unaccredited course. Due to the current shortage of general medicine practitioners and primary care providers, particularly in remote and rural areas of Virginia, the competency and resourceful ways in which naturopathic doctors practice is much needed.

The most notable addition to our healthcare system that can be made by recognizing through licensure of naturopathic doctors is their focus on prevention of healthcare issues. Instead of waiting for a disease to present, naturopaths focus on the whole patient; their body, their environment, their past traumas, etc. This approach could greatly economically impact the whole of the healthcare system by circumventing disease entirely through prevention. They use the same approach to restore those with disease. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and

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On Sat, Aug 15, 2020 at 12:24 PM CHERYL SOBOWLEWSKI <[cdes1@verizon.net](mailto:cdes1@verizon.net)> wrote:

Dear Board of Health Professionals,  
As a 33 year resident of the state of Virginia, I am writing this email to urge you to recommend licensure for medically trained Naturopathic Doctors.  
It is my right and privilege, living in the United States, to have the availability of licensed medically trained Naturopathic Doctors.  
Every United States citizen has the right to choose how they want to manage their healthcare. I choose to have the choice of a licensed medically trained Naturopathic Doctor.  
Thank you.  
Cheryl Sobolewski

"What will separate us from the love of Christ?...No, in all these things we conquer overwhelmingly through Him who loved us." Romans 8:35, 37

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botanical medicine. Licensure is necessary to protect the public from those who are not properly trained to collaborate with other medical professionals and refer when necessary. Oversight would prevent unnecessary harm to the public from those who are untrained. Licensure would allow this accountability portion and protect our citizens of the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,  
Tonya Noel Traas

Sent from [Mail](#) for Windows 10

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August 14, 2020

Virginia Board of Health Professions Regulatory Research Committee

Dear Members of the Committee,

The Association of Accredited Naturopathic Medical Colleges is writing in support of fully licensing medically-trained naturopathic doctors. The AANMC represents all accredited programs of naturopathic medicine in North America who confer the degree 'ND.' Accreditation in this sense refers to oversight by a) Regional accreditors recognized by the US Department of Education (USDE) and the Council on Higher Education Accreditation (CHEA) such as the Middle States Commission on Higher Education. And b) it includes programmatic accreditation by the Council on Naturopathic Medical Education, which is also recognized by both the USDE and CHEA. Accredited ND programs and their host institutions can be found on this government website: <https://ope.ed.gov/dapip/#/home>

Naturopathic Medicine is a distinct primary health care profession that combines the traditions of natural healing with the rigors of modern science. Naturopathic doctors (NDs) are trained as primary care providers who diagnose, treat and manage patients who have acute and chronic conditions, while addressing disease and dysfunction at the levels of body, mind and spirit. NDs concentrate on whole patient wellness through health promotion and disease prevention, attempting to find the underlying cause of the patient's condition. NDs care for patients of all ages and genders. They provide individualized, evidence-informed therapies, applying the least harmful and most effective approaches to help facilitate the body's inherent ability to restore and maintain optimal health.

Graduates of accredited programs receive a doctorate in naturopathic medicine from regionally and programmatically accredited institutions, after four years of in-residence didactic and clinical training, similar to all first professional degrees (DDS, DC, DPM, DO etc.). They use ND or NMD as the professional abbreviation for their degree. Use of professional titles (DDS, DC, DPM, DO, etc.) is protected for graduates of recognized programs in order to protect the public and clarify the scope and training of these providers for consumers. Any individual holding themselves to be a practitioner of one of these professions without the requisite training and regulation would be held to penalties under law. Additionally, NDs complete national board examinations in the biomedical and clinical sciences as administered by the North American Board of Naturopathic Examiners. Passage of this examination is required for regulated practice in North America.

Naturopathic medicine is and should be no different than our sister regulated practices. We are concerned about the dangerous confusion to the public with lack of regulated practice in Virginia.

The AANMC publishes the [Core Competencies of the Graduating Naturopathic Student](#), which outline the stringent guidelines and expectations of clinical and professional practice for licensed naturopathic doctors graduating from an accredited naturopathic program. The competencies include, but are not limited to medical assessment and diagnosis, patient management, communication and collaboration

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therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention.

Naturopathic doctors are experts in their field and they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

3) Autonomous practice. Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.

4) Scope of practice. Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are capable to provide. Naturopathic doctors are also adept in non-pharmacological approaches to pain management, addiction, chronic diseases like heart disease and diabetes, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.

5) Economic impact. Licensing naturopathic doctors will increase the number of NDs in Virginia, thereby increasing patient access to preventive, integrative care. Preventive medicine saves healthcare dollars in the long and short-term by addressing or preventing the root cause of illness and eradicating sequelae of disease. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding that patients would be able to submit to insurance for coverage. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.

6) Alternatives to regulation. Without regulation, citizens who are harmed by naturopathic doctors lack adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, do not protect future patients from harm, and set no minimum requirement for continuing education. In the absence of medical board oversight, there is no ability to suspend or revoke licensing or credentials and have that information available to the public.

7) Least restrictive regulation. Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors -- titles vary by state). Neither certification nor registration adequately distinguishes between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME-accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process does not offer an objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

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(including mandated reporting requirements), professionalism, career development and practice management, systems-based practice, and practice-based learning, research, and scholarship. These competencies and their subsequent assessment are very similar to other primary care professions.

There are currently 25 states and territories that regulate Naturopathic medicine. These jurisdictions allow Naturopathic doctors to use the ND designation. Some states also include N.D. as well as other terms (N.M.D or NMD).

In my more than seven-year tenure as executive director of the AANMC, I have regularly been made aware of complaints from patients, students, attorneys and government agencies regarding unaccredited programs and their graduates. Patrons of these unaccredited operations have felt preyed upon, not realizing the coursework and their hard-earned money, would not lead to regulated practice, and that in some circumstances could even result in them being fined or imprisoned. Patients have been harmed by dangerous and lethal medical advice from graduates of unaccredited programs, who may have had no standardized clinical or medical training. Many of these programs meet the definition of diploma or degree mill (<https://www.scholaro.com/unaccredited-universities/>).

I am happy to provide any and all documentation demonstrating the rigorous training and standards that accredited naturopathic graduates complete and implore you all to strongly consider public safety in granting patient access to accredited naturopathic medical graduates and only accredited naturopathic graduates use of the designation ND.

Please see AANMC commentary regarding the 7 Criteria for an application to be a regulated healthcare profession in the Commonwealth of Virginia.

1) Risk of harm. The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity -- while promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctor', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be allowed use of the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of all patients. This is standard accountability for medical professionals.

2) Specialized skill and training. Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year, onsite medical program, and board exams in basic sciences. They also take clinical licensing exams in diagnosis and treatment, pharmacology, nutrition, botanical

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The AANMC strongly supports licensing of medically-trained naturopathic doctors by the Commonwealth of Virginia, and encourages the Board to make a recommendation for licensure.

Please let me know if you have any questions. Thanks for your time and consideration.

Respectfully,

JoAnn Yanez, ND, MPH, CAE  
Executive Director  
Association of Accredited Naturopathic Medical Colleges

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On Sat, Aug 15, 2020 at 4:03 PM Decorative Glass - Diane Fairburn <Diane@decorativeglassolutions.com> wrote:

Dear Members of the Committee, my name is Diane Fairburn, I have been a Virginia resident for 45 years and I have been under the care of a naturopathic doctor for over 2 years. I am writing in support of a recommendation for licensure for medically trained naturopathic doctors. I have been under the care of a Naturopathic doctor for my primary care physician and specialists could not help me. As a patient who supports licensure for medically trained naturopathic doctors, here are a few concerns I have as it relates to some of the seven criteria.

Naturopathic doctors consider the patients' health holistically. They are the only medical providers specifically trained in drug/herb and drug/nutrient interactions. They help bridge the gap between conventional and traditional medicine. While many of the healthcare services that ND's are trained to provide are shared with other medical professions, ND's do have specific education in certain areas that are not included or emphasized in other practices.

Economic Impact- Licensure ND's would pave the road to insurance coverage. Currently they are unable to use proper coding that would enable insurance coverage. It has been quite a burden on my family's budget to have to pay out of pocket for services from my ND. One of my employees is in desperate need to be treated by a ND. Because his insurance does not cover it he has to rely on drugs with severe side effects that are helping him only a little.

I respectfully urge the board to recommend licensure for ND's.

Thank You,

Diane Fairburn, designer IFDA

Decorative Glass Solutions

10049 Lickinghole Rd Suite G Ashland, VA 23005

804.798.8806

[www.DecorativeGlassSolutions.com](http://www.DecorativeGlassSolutions.com)

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From: <dianewian@aol.com>

Date: Sat, Aug 15, 2020 at 5:55 PM

Subject: Letter in support of Naturopathic doctors/medicine in Virginia

To: [drmarie@drmarierodriguez.com](mailto:drmarie@drmarierodriguez.com)

August 15, 2020

Dear Members of the Committee,

My name is Diane Wian, I have been a Virginia resident for 23 years and I have been under the care of a naturopathic doctor for over 12 years. I am writing in support of full licensure for medically-trained naturopathic doctors. I had chronic respiratory issues that led to severe and frequent colds, and am fortunate to have come across Dr. Marie Rodriguez, ND, whose careful listening and skillful prescribing of naturopathic medicines supported my immune system, resulting in very limited and non-severe colds.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Specialized skills.** Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. Natural medicines have been used to heal humans for centuries, and natural medicines are more congruent with healing effectively and sustainably. However, should a modern conventional solution be needed, I like that Naturopathic doctors are extensively trained in both conventional approaches and natural medicine as they help bridge the gap between convention and traditional medicine practice.

**2) Autonomous practice.** Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medical providers do not have the same training and knowledge in both conventional and natural medicine. I am so grateful for the healing treatments and on-going immune support I received from my naturopathic doctor. Conventional doctors prescribed conventional medicines which did nothing to heal my respiratory issues, nor support my immune system.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

L. Diane Wian  
Annandale, VA 22003

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On Sat, Aug 15, 2020 at 6:36 PM Karen Hamilton <klhamilton2@verizon.net> wrote:  
August 15, 2020

My name is Karen Hamilton, and I have been a Virginia resident for 14 years. I have been under the care of a naturopathic doctor for over 10 years. I definitely support the recommendation for licensure for medically-trained naturopathic doctors.

Honestly, I don't know where I would be health-wise without the care of my medically-trained ND. I have two hard-to-diagnose conditions that went undiagnosed by medical professionals for years and caused me a lot of pain. But over time, using holistic methods, my ND was able to determine the causes of my symptoms and offer some solutions. My relationship with her has been life altering.

It has been frustrating that I have had to make additional appointments with my primary care doctor to order lab tests or imaging, causing me extra time and expense, when my ND is perfectly knowledgeable and capable of ordering the required tests. And since primary care doctors are overburdened and pressed for time, allowing NDs to provide more services could relieve some of that burden.

And of course, if licensure could lead to insurance coverage for ND services, that would be a huge plus. I have spent thousands of dollars over the years on ND appointments and supplements, and while my health was worth it, it was a burden.

I understand there are no alternatives to regulation that would address the fundamental issue of allowing naturopathic doctors an expanded and defined scope of practice in Virginia. As a patient and a consumer, I want access to safe (regulated) and holistic care that best aligns with my health needs.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia. Please!

Sincerely,  
Karen Hamilton  
Chesterfield, VA

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From: **Jane Smith** <sheniteowl@gmail.com>

Date: Sat, Aug 15, 2020 at 11:52 PM

Subject: Naturopathic Doctors Support

To: <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

August 12, 2020

Dear Members of the Committee,

My name is Jane Smith, and I have been under the care of a naturopathic doctor for over 10 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

When traditionally trained medical doctors could not provide any relief or stabilization for my autonomic dysfunction and MTHFR epigenetic mutations that have no FDA approved drugs to treat I sought out a naturopathic doctor to help me. The naturopathic doctor has helped me stabilize my health problems as best they can be and helped obtain me a higher quality of life while living with my conditions.

When a person has a problem that has no FDA approved drugs to treat medical doctors are often left with little to help their patients. I have two of the many problems that have no FDA approved drugs to treat. I have tried "off-label" medication prescribed by a medical doctor but it either did not help or all too often made me sicker. Working with my naturopathic doctor in conjunction with my medical doctor has been better than my medical doctor alone. The naturopathic doctor has different training and approaches that work extremely well for stabilizing my health problems. I will continue to see both medical doctors and a naturopathic doctor simply because both kinds of doctors are needed for me to obtain and maintain a good quality of life.

I see my medically-trained naturopathic doctor specifically because other medical providers do not have the same training and knowledge in both conventional and natural medicine. My naturopathic doctor has referred me to other doctors and I have valued her experience to recommend the kind of doctor I need to see.

Currently, if my naturopathic doctor would like any kind of test done I must go to my medical doctor and request it. Thankfully my doctors work together but it requires me to make and pay for another doctor's appointment. Medical care is expensive enough without having to see two different doctors for required testing because the naturopathic doctor cannot order testing. Not once has my medical doctor thought the requested testing was not called for or unnecessary and it usually offers them an additional incite to my current health status.

I have always paid for great medical insurance coverage and I should be allowed to use this coverage that will best serve my needs. I am healthier seeing a naturopathic doctor and I should be able to use my medical insurance to pay for the appointments.

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As a patient and a consumer, I want access to safe, regulated, and holistic healthcare that best aligns with my health needs and are provided by a medically-trained naturopathic doctor.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for all patients in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,  
Jane Smith

On Sun, Aug 16, 2020 at 8:49 AM Nancy Hein <nancyjoyhein@gmail.com> wrote:  
August 14, 2020

Dear Members of the Committee,

My name is Nancy Hein. I am a Virginia resident for over 30 years and I have been under the care of a naturopathic doctor for over 6 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

In frustration with the diagnosis of a life-time chronic autoimmune disease I reached out to a naturopathic doctor. She met with me, listened to my concerns and put into place a long term action plan. Most importantly we worked with my endocrinologist. Together traditional and naturopathic medicine brought me to remission. I don't believe I would have achieved this without my ND.

As a patient who supports licensure, here are a few concerns I have as it relates to the seven criteria. I am most concerned about working with a trained ND. I was fortunate to have received excellent personal recommendations from others who worked with this practice. There needs to be the same level of professional accountability and standards as the other regulated health professions in VA.

Specialized Skills: As I said, my ND listened - my particular autoimmune disease is almost all stress induced and she addressed every aspect of my life.

Regarding Economic Impact: I am a retired person and for me going forward finances are a concern. Being able to have insurance coverage would be so helpful. I paid out of pocket because it has offered me a way to heal that traditional medicine alone could not do.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

My best to you,  
Nancy Hein  
Henrico, Virginia

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August 3, 2020

Dear Members of the Committee,

My name is Ann Marie Stoddard, I have been a Virginia resident for 14 years and I have been under the care of a naturopathic doctor for over 5 years. I am writing in support of full licensure for medically-trained naturopathic doctors. I began visits with my Naturopathic doctor over 5 years ago because I was struggling with my weight and other issues.

This doctor took the time to really analyze the symptoms I listed and came up with a detailed plan for me to follow. Without the dedication of this doctor and colleagues alike, I feel I would have never been given the care that was needed! I would like to focus on "scope of practice" for a moment. As I started to receive care from my Naturopath I was still needing to see my primary care doctor for basic lab work as well as more focused lab work to explore underlying causes for my symptoms. Why is the doctor that is doing the research not able to execute the labs and other possible tests for diagnosis? The extra time I had to spend seeing a different doctor to provide lesser care, took time away from a treatment plan that was extremely needed. They too are trained and are fully capable of ordering labs and providing a physical exam.

I feel the time has come for Naturopathic doctors to be able to provide the same medical services such as their colleagues provide in other states. I urge the Committee to support full licensing of medical-trained naturopathic doctors.

Sincerely,

*Ann Marie Stoddard*  
Annie Marie Stoddard  
Locust Grove, Virginia

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Certificate Of Completion		
Envelope Id: 4A83D3811580407EB64D8BE71ADC38E2		Status: Completed
Subject: Stoddard Letter of Support for ND Licensing to BHP Regulatory and ...		
Source Envelope:		
Document Pages: 1	Signatures: 1	Envelope Originator:
Certificate Pages: 1	Initials: 0	Annie Stoddard
AutoNav: Enabled		anniestoddard10@gmail.com
Envelope Stamping: Disabled		IP Address: 64.207.219.8
Time Zone: (UTC-08:00) Pacific Time (US & Canada)		
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Status: Original	Holder: Annie Stoddard	Location: DocuSign
8/16/2020 7:30:27 AM	anniestoddard10@gmail.com	
Signer Events	Signature	Timestamp
Ann Marie Stoddard	<i>Ann Marie Stoddard</i>	Sent: 8/16/2020 7:30:28 AM
anniestoddard10@gmail.com		Viewed: 8/16/2020 7:30:46 AM
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Security Level: Email, Account Authentication (None)	Signature Adoption: Pre-selected Style	Freeform Signing
	Using IP Address: 73.177.140.60	
Electronic Record and Signature Disclosure: Not Offered via DocuSign		
In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	8/16/2020 7:30:28 AM
Certified Delivered	Security Checked	8/16/2020 7:30:46 AM
Signing Complete	Security Checked	8/16/2020 7:32:33 AM
Completed	Security Checked	8/16/2020 7:32:33 AM
Payment Events	Status	Timestamps

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Dear Members of the Committee,

August 16, 2020

My name is Lindsay Kluge, and I have been a resident of Virginia for 34 years. I have been a practicing licensed nutritionist and clinical herbalist in the state of Virginia since 2012, and have been under the care of a naturopathic doctor as needed for 8 years. **I am writing to urge you to recommend licensure for medically-trained naturopathic doctors.**

As a patient of naturopathic doctors myself, I have never been more seen and heard, cared for and supported by any health care provider. Their wellness plans were successful and personalized for me, research based and clearly communicated, and I will always continue to seek out licensed naturopathic doctors for my health care.

I have also had the privilege to work alongside several Naturopathic Doctors within a clinical practice to provide nutrition and herbal medicine support for the patients within the practice for 6 years. This collaborative healing environment was quite rare within the state of Virginia, and extremely well utilized by people even within 200 miles of the practice. The naturopathic doctors I worked with - all medically trained and licensed within accredited states including Oregon, Vermont and Arizona - were exceptional health care providers. They practiced with considerable care, constant professionalism, and a high degree of knowledge that their skilled profession requires.

In the practice, we kept a lengthy referral list for additional practitioners who could serve our patients for specific needs, including acupuncturists, dietitians, massage therapists, health coaches, and other trusted, well trained lay professionals. *Within alternative health care, our community of healers and healthcare colleagues are essential to patient care.* Likewise, other lay practitioners in our community retained a referral list for trusted naturopathic doctors to refer their clients, as we (other natural practitioners), must

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August 16, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Dr. Desiree Galante, and I have been a naturopathic doctor for 3 years. I am writing in support of full licensing medically-trained naturopathic doctors.

I opened my own naturopathic office in Alexandria, Virginia in 2019 after moving from Connecticut where I attended a 4-year accredited naturopathic medical school, completed a 1 year medical residency, and then worked in a clinic for almost 2 years. The clinic that I worked in while in Connecticut accepted insurance and therefore, I was able to work with a large and diverse population of patients. Because naturopathic doctors are fully licensed in Connecticut we are able to treat, diagnose, order labs, perform physical exams, and also accept insurance. This is what we were trained to do. We do not want to take the place of a conventional MD because that's not what we are but what we do want is to be able to use our years of training to their full potential.

We have the knowledge base to understand from a physiologic level what is happening in the body, we understand when there is a need for additional imaging or labs or to perform a physical exam to further examine the individual. These are things we currently cannot do in the state of Virginia. We cannot take the temperature of someone who is feeling ill, we cannot take a blood pressure, we cannot order basic blood work to help guide an appropriate treatment path. The foundation of our training as naturopathic doctors is to treat an individual holistically. It is almost impossible to do this when we are having to refer them to multiple individuals to get labs done, imaging done, physical exams, and more. In addition many doctors are resistant to order any labs or imaging that the patient wants. So what I am finding is that when I make a recommendation to an individual of certain lab markers I believe to be important to have ran, they are asking their doctor and their doctors are refusing to do so and then the individual feels stuck. Even if we discover that they have a diagnosis that may have been missed from their other doctors we are not allowed to diagnose them, this also must be confirmed and diagnosed by an outside MD.

There are a growing number of individuals who are not finding the help they require from conventional medicine. Over and over again the individuals that I work with voice to me their frustration with conventional medicine, typically they have already seen numerous medical doctors and specialists who all have failed to find anything wrong. They are being told everything is normal and there's nothing else they can do for them. Naturopathic medicine is often their last stop, their last hope. Feedback that they express is that they feel that they are finally heard, we take the time to listen, we go into detail about their diet, sleep, stress, digestion, mood, and other areas to understand the full picture. Time specifically is something they often don't have access to with their doctors. They don't have the time to voice their whole story. They are being told to diet and exercise to improve their health without the doctor taking the time to map out to

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practice within our limited scope of practice, and rely on the skill and training of licensed naturopathic doctors in Virginia to provide the highest level of holistic care.

**Recognizing licensure of Naturopathic Doctors will in no way keep other natural practitioners from providing care.** On the contrary, their recognized licensure would bolster my confidence in my referrals, and give my clients the confidence that their naturopathic doctor had the appropriate training, education, experience and accreditation they require.

It is confusing and frustrating that the state of Virginia has no regulation regarding who can call themselves a naturopathic doctor. In Virginia, there are traditional naturopaths who call themselves naturopathic doctors, but who *never went to medical school*. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they have been able to safely access care from medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low-risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia.

**I strongly encourage you to recommend licensure for Naturopathic Doctors in the state of Virginia** for the health and safety of all who seek professional holistic care.

In gratitude,

Lindsay Kluge, MS, CNS, LDN

Clinical Herbalist & Licensed Dietitian Nutritionist

Lexington, Virginia

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them what that looks like, how they can implement that. They feel empowered by someone taking the time to actually teach them about their bodies and what's happening so that they can understand how their lifestyle, diet, stress, etc. can impact them. Not only do we help support the main ailment they came in with but we improve their quality of life, their wellbeing.

Virginia has so many people who can benefit from naturopathic medicine and so many people who can benefit by better understanding that their everyday choices of what they are eating, what they are putting on their bodies, how they manage their stress can impact so many things from their digestion to their mental health. These people deserve to have access to a naturopathic doctor who is medically trained to assure the best care. They need to be in the hands of individuals who have an in-depth knowledge base of herbal medicine, nutrition, anatomy and physiology, and pharmaceuticals. They deserve to know who spent years in training with board examinations versus weeks without board examinations. There are no downsides to a healthier and happier population and that is exactly what our clients express they are after working with myself.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath; licensure, and a regulatory framework, will provide clarity – while also promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors

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are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths,

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which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,  
Dr. Desiree Galante

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Alliance for Natural Health USA  
1011 E. Jefferson St #204  
Charlottesville, VA 22902  
(800) 930-9762  
www.anh-usa.org

August 14, 2020

Virginia Board of Health Professions  
Attn: Laura Jackson  
9600 Mayland Drive, Suite 300  
Henrico, VA 23233

Dear Members of the Virginia Board of Health Professions:

As a resident of Virginia and a member of the Alliance for Natural Health USA, I urge the Virginia Board of Health Professions to recommend licensure of Naturopathic Doctors (NDs) who have been educated at accredited, four-year naturopathic medical schools. This would expand consumer options beyond medical doctors to include those who use a more natural approach.

Licensure for naturopathic physicians is a huge step forward for public health in the state. Virginians demand access to various types of practitioners, and they should have the ability to choose the practitioner that fits their unique needs, including licensed NDs and traditional naturopaths, who focus on the root causes of illness.

It is also important that ND licensure not come at the expense of traditional naturopaths - those educated at non-accredited institutions or via apprenticeships. Traditional naturopaths must be allowed to continue practicing to the extent of their training and ability and to use the title "traditional naturopath." I believe in the consumer's right to select whatever practitioner - naturopathic doctor or traditional naturopath - that fits his or her needs.

An ND licensure program ultimately protects patient choice in health care by allowing citizens to receive a more holistic system of care from a naturopathic doctor. As a growing number of Virginians suffer from acute and chronic illness and the state has an insufficient number of primary care providers, there is great need for consumers to have the option to receive personalized, holistic treatment from NDs educated at accredited, four-year naturopathic medical schools.

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Open and fair markets, in which consumers can decide what credentials and level of education they seek in healthcare professionals, guarantee the best outcomes. Please recommend ND licensure to the Virginia General Assembly and reserve a title allowing traditional naturopaths to continue to practice under the title "traditional naturopath."

Sincerely,

The Alliance for Natural Health USA

The undersigned 95 individuals:

Jennifer	Donner	88061-9347
Jerry	Teplitz	23454-2313
David	Scherer	23185-4356
Elizabeth	Davis	20164-1442
Sarah	Lanzman	22920-1541
Michelle	Bielovitz	22485-7242
Laurie	Smith	20106-9625
Karen	Mayeda	22734-1884
Toni	Murto	20164-1127
Delora	Gillman	22906-6966
Mark	Santora	23093-2161
John	Helisek	22309-2556
Brenda	Kroupa	23228-5710
JC	Rotunda	22901-3002
Janet	Martucci	24015-3933
Dorothy	Beeman	22314-5339
Ross	Dunseath	88061-9729
Suzanne	Morris	22938-2321
Ann	McCaffray	22740-2050
Linda	Stowell	23089-9403
Kelton	Mitchell	20164-3407
Bruce	Rauscher	22312-2005
Patricia	Daniels	20109-6416
Barbara	Craven	23437-8839
Laurie	Schober	23452-6750
Pam	Chou	23606
John	Fincher	22553-7734
Brian	Freund	23093-6337
Penny	Prentice-Best	24122-2639
Rhonda	Johnson	23009-3320
Kelly	VanDyke	24073-5840

88 212



Michelle	Dail	23666-5564
Douglas	Rasmussen	22192-3368
Jane	Stegmaier	22602-7807
Glen	Burch	22514-2106
Ginny	Rodgers	20170-4355
Jane	Longest	23103-3243
Connie	Youngman	22827-2308
Cheryl	Arthur	22901-2518
Littlepaige	Wempe	22906-6158
Everett	Craft	24175-5854
Lee	Reaves	22554-8339
Sandra	Middour	20118-1936
Larry	Hemphill	20186-3074
Charlotte	Shnaider	24401-2347
Ann	Violi	23389-0038
Clayton	Bodine	20105-3445
Betty	Vornbrock	24343
Robert	McClintock	23954-3103
Andrew	Trowbridge	24502-4295
C.	Kasey	23116-2781
S. Ray	Barnes	23321-3904
Vincent	Cackowski	24122-2970
Steven	Vogel	22046-4121
Sandy	Craig	23452-3818
Sallie	Rosa	22463-0708
Dova	Wilson	20165-5618
Michele	Kirkdorffer	22801
Connie	Webb	24137-5234
Dan	Townsend	23234-5615
Bob	Lambert	23692-4240
David	Matthews	22026
Bernard	Hurlock	22436-2224
Brent	Icenhour	24292
Janet	Smith	22153-1326
Dean	Bleher	20194-1728
Claude	Coleman	23704-1810
Tom	Grigsby	20190-4832
Sue Ann	Mangels	23124-2983
Deanna	Child	20115-2153
Greta	Bollinger	23225-3314
Elina	Stanley	20176-7430
Deirdre	Hackleman	22301-1040
Susan	Baker	23454-3271

Sue	Ferrick	24153-7109
Mike	Jawer	22180-6837
Barbara	Rosholdt	23117-0007
Renee	Ward	23112-6853
Belecia	Weeks	23113-6826
Kristie	Fleming	24060-8527
P Sherron	Marquina	23235-1877
John	Platt	22602-7048
Marshall	McCorkle	23505-4456
Gerry	Parent	23235-6723
Hunter	Lewis	22932-1521
Lorrie	Gilbert	23322-5208
Jennifer	Davidson	22737-3130
Donna	Kobielus	22315-5594
Storm	Cunningham	22207-1139
Robert	Kowalke	23831
William	Schenck	23608-8605
Lori	Ruhlin	20170-4019
Vivian	Orgel	23507-1760
Leland	Stillman	23226-1305

Cloe Franko  
181 Zephyr Circle Se  
Floyd, VA 24091

August 16, 2020

Dear Members of the Committee:

Thank you for your perseverance toward regulating naturopathic doctors in Virginia. My name is Cloe Franko and I am a third year student at the Canadian College of Naturopathic Medicine. I was born and raised in Floyd, Virginia, attended the University of Richmond, and hope to return to Virginia to practice naturopathic medicine. I am writing in support of full licensing for medically trained naturopathic doctors with degrees from CNME accredited institutions.

My decision to pursue naturopathic medicine was a big one, made particularly challenging because Virginia, the state to which I hope to return and practice, remains unregulated for naturopathic doctors. I found naturopathic medicine through my own health journey when conventional medicine was unable to support me. I believe deeply in its effectiveness and potential to greatly improve the lives of many Virginians. I am taking on significant debt to pursue my degree. The risk associated with my student debt is increased due to my intent to practice in a state where NDs are currently unlicensed. For instance, I will not be able to practice the full extent of the medicine I'm being trained in if I cannot carry out physical exams on my patients, cannot provide naturopathic diagnoses to my patients, and cannot order labs. Each of these limitations has the potential to reduce my effectiveness, make my practice less accessible and appealing to patients, and reduce my earning potential and subsequent ability to pay back my student loans.

Naturopathic medicine, just like all other medical professions, should have oversight to ensure accountability and public safety. Below I share my insights regarding some of the criteria used by the Board:

- 1) Risk of harm.** As you know, medically trained naturopathic doctors receive four years of onsite medical training at institutions accredited by the Council on Naturopathic Medical Education (CNME), complete with hands-on practicals, board exams, and a full year internship. Without licensure or a regulatory framework in Virginia, it is extremely difficult for the general public to distinguish our levels of training from those of a lay naturopath whose education is not monitored for quality assurance and provides nowhere near the depth of medical training I am receiving. The lack of clarity on the medical background of their providers creates additional risk for patients who seek naturopathic care. Only medically trained naturopathic doctors, who have received doctoral degrees from federally recognized accredited programs should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who

presents themselves as a "doctor" has commensurate medical education and training.

- 2) Specialized skill and training.** Medically trained naturopathic doctors go through a rigorous and fundamentally distinct type of education that sets us apart from lay naturopaths and other medical providers. We receive training in the complex interactions between pharmaceuticals, supplements, and botanical medicine in a way that no other medical provider does. As more and more Virginians are seeking alternative and preventative medicine, it is crucial they have access to practitioners who can advise them on the safest and most effective ways to do so. The current and growing crisis of chronic disease, exacerbated by the COVID-19 pandemic, necessitates increased access to specialized professionals who have expertise in prevention and holistic care. Moreover, medically trained naturopathic doctors would benefit from the true distinction, which will encourage more NDs to move to and practice in Virginia, bolstering the health of the population (and economy).
- 3) Scope of practice.** Naturopathic doctors are trained as primary care providers as well as in a number of modalities from nutrition and botanical medicine to acupuncture and physical medicine. Our scope of practice should reflect the depth and breadth of our training. Virginians need increased access to the full range of primary care and preventative services that medically trained naturopathic doctors can provide, from pain and addiction to chronic disease and mental health illness. We are trained to work collaboratively with other healthcare providers and bridge the gap between conventional and alternative medical approaches. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 4) Economic Impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. If Virginia has not passed legislation to license and regulate NDs when I graduate in two years, I will consider moving to Maryland or the District of Columbia (the two closest regulated regions) to set up my practice. This not only fails to serve Virginia's population, but also fails to bring resources and taxes into Virginia's economy. Moreover, licensing is the first step towards some level of insurance coverage for patients. At least six states currently allow for health insurance coverage of naturopathic care by licensed NDs. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. This makes naturopathic care available only to those who can afford to pay entirely out-of-pocket. Many of the Virginians who need this care most and would benefit most greatly are unable to access the services that naturopathic doctors are so well positioned to provide. It is critical to me that I am able to make my practice financially accessible to patients regardless of wealth. The ability to accept insurance coverage for the care I provide is a critical piece of ensuring my practice is accessible to people of all socioeconomic backgrounds.
- 5) Alternatives to regulation.** Licensure and a framework should exist for accountability of the profession of medically trained naturopathic doctors to ensure the protection of the public. Without regulation, citizens who are harmed

by naturopathic doctors don't have adequate redress. The current alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and make that information available to the public.

- 6) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically trained health care professionals. Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. Fortunately, no states offer certification, and in the few states that register naturopathic doctors, the process in those states functions like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can register and call themselves naturopathic doctors. Unfortunately, the existing Virginia BHP registration process does not distinguish between medically trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically trained naturopathic doctors will provide a range of benefits to Virginia's residents and economy without changing the ability of lay naturopaths to provide the services they currently provide. This decision has a huge impact on my future and I appreciate your attention. I respectfully urge the Board to recommend licensure.

Sincerely,

Cloe Franko

August 16, 2020

Dear Members of the Committee,

I appreciate your thorough evaluation of the regulation of the practice of naturopathic doctors in Virginia. My name is Mandy Reckers, and I have been a naturopathic doctor practicing in central Virginia for over 10 years. I am writing in support of full licensing of medically trained naturopathic doctors.

I have found over the past 10 years that the care of my patients has been frequently disrupted, delayed, and limited due to the inability of me to practice to the full extent of my training. Because my appointment times are long, I am able to take a very thorough history, but I am unable to complete that evaluation with physical exams and laboratory testing (as I am trained). I frequently refer to general practitioners and specialists, but this would be greatly streamlined for the patient if I were able to send them with an appropriate assessment already completed.

I understand that over the years, licensure has been denied to NDs due to the idea that there is not enough risk of harm. I recall in 2010 when I moved here from Oregon, where I attended naturopathic medical school and where NDs have a broad scope of practice, how patient after patient who sought my care claimed they had seen a naturopathic doctor in the past. Upon further investigation, the vast majority had seen a practitioner who called himself or herself a naturopathic doctor, despite having only done a short correspondence or online training. Not a single person knew that these "NDs" did not go to medical school and assumed they were being guided by a thoroughly trained professional. Another issue is that naturopathic doctors, like any other medical professionals, need to do regular continuing education to assure that they are up-to-date on the latest medical research. Currently, there is no assurance that this happens. Over the past decade, natural medicine has become increasingly sought-after, and I strongly believe that the public deserves to have a reliable way to assess whether their naturopathic doctor is not only properly trained, but doing their due diligence to keep their knowledge current.

Thank you for taking the time to receive my opinion. I respectfully urge the Board to recommend licensure.

Sincerely,



Mandy Reckers, ND

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MONICA D. KLISZ, LPC  
Counseling for Recovery, Growth & Wellness  
3111 Northside Avenue, Suite 101, Richmond, VA 23228  
804.366.4330

MONICA D. KLISZ, LPC  
Counseling for Recovery, Growth & Wellness  
3111 Northside Avenue, Suite 101, Richmond, VA 23228  
804.366.4330

TO: Dr. Elizabeth Carter, Department of Health Professions  
FROM: Monica D. Klisz, LPC  
RE: Licensing Naturopathic Doctors  
DATE: August 16, 2020

I am a psychotherapist in Richmond, VA writing in support of licensing Naturopathic doctors as full physicians with the ability to diagnosis and treat patients, provide complete physical exams and authorize labs and imaging for patients.

In my work with clients I often have the honor and privilege of collaborating with local naturopathic doctors. In my experience naturopath's broad and holistic view often allows for solutions to complex and troubling medical conditions that are misdiagnosed or under treated by traditional Western medicine. I have also found naturopathic doctors to be quite adept in assessing for mental health issues, triaging and referring patients out for counseling to augment the medical treatment. This has consistently led to better outcomes for my clients.

I would like to provide some important aspects related to licensure in reference to the seven criteria established by the Department of Health Professions.

1) *Harm/risk of harm:* Licensing naturopathic doctors provides a framework to differentiate lay healers from those that have been trained as naturopathic doctors. Other states within the US license naturopathic doctors. If a person moves to Virginia from a state that licenses naturopathic doctors, they should be assured that they are getting a medical trained naturopathic doctor. At this time due to Virginia not licensing naturopathic doctors, any lay provider or citizen is able to use the term "naturopathic doctor" without the appropriate education and training. This is an ethical issue and has the ability to lead to harm.

2) *Specialty training:* Naturopathic doctors have special training and skills not only in pharmacy but also plant medicine, homeopathy, counseling and nutrition. These individual skills may overlap with other disciplines within medicine, but naturopathic doctors know them collectively and thus are aware of potential interactions and side effects of the combination of such therapies. Additionally, naturopathic doctors are focused on prevention and holism which is also what makes them unique.

3) *Scope of practice:* Because naturopathic doctors are trained as medical professionals, they have the ability and competence to provide physical exams, order lab testing and imaging as well as in certain states prescribe drugs and even perform minor surgery. As with any

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profession, each state has different scopes of practice that is set up. This should not be alarming. This should be catered to the population and needs of each state as long as the professional has the adequate training and has performed competency through licensing exams or other professional standards. There are times when a drug is warranted. Additionally, there are also times where patients have improved where they can be appropriately monitored and weaned off of pharmaceuticals. In order to provide this, you must also have prescribing privileges. Thus, having an appropriate scope of practice including pharmaceuticals, can be judiciously and ethically overseen to make sure patients have appropriate access to therapy just like other medical professionals within the Commonwealth. It is also important to note, there are many providers leaving medicine and without having some prescription authority could be detrimental to access to care for patients. One of the areas in medicine most lacking providers at this time is in mental health. Having additionally trained providers to adequately assess patients holistically when they are suffering with mental health concerns could reduce harm and delay of treatment.

Given the robust and thorough approach of naturopaths, as well as the holistic and patient-centered nature of these providers I can only imagine how much it would enhance patient care and access to provide a licensure process and broaden what a naturopath can provide for patients. With this, I ask that the Board vote in favor of recommending naturopathic licensure within the Commonwealth.

90 220

On Sun, Aug 16, 2020 at 4:43 PM Natalie Brock <natalie.b.brock@gmail.com> wrote:  
Dear Members of the Committee,

My name is Natalie Brock, I have been a Virginia resident for 6 years and I have been under the care of a naturopathic doctor for over 5 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

My naturopathic doctor takes such a well rounded approach to my health and never makes me feel rushed or insignificant. She was able to analyze my medical history, labs and genetics in order to support my many layers of underlying issues. I've never felt better and I credit it all to my naturopathic doctor.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Specialized skills.** As someone who makes my health and wellness a priority I rely heavily on Naturopathic doctors as they consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. While many of the healthcare services that NDs are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that aren't included or emphasized in other practices.

**2) Autonomous practice.** Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medical providers do not have the same training and knowledge in both conventional and natural medicine. I also trust my ND to refer me to a specialist or another healthcare provider, in order to ensure the best care possible.

**3) Scope of practice.** As a working mother, now more than ever, I do not have the time nor childcare resources to run between multiple providers when my ND can provide the care I need. Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. They are not allowed by law to give a medical diagnosis for my medical records, and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from an ND. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring (I have lost 2 primary care doctors over the last 4 years), and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services.

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**4.) Alternatives to regulation.** There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient and a consumer, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for medically-trained naturopathic doctors in Virginia.

Sincerely,

Natalie Brock  
Ashburn, VA

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August 11, 2020

Dear Members of the Committee,

My name is Joseph Trindal, I have been a Virginia resident for 63 years and I have been under the care of a naturopathic doctor for over 12 years. I am writing in support of full licensure for medically-trained naturopathic doctors. Naturopathic medical protocols help me manage a medical condition through supplements and diet with progress verified by a medical doctor. However, the medical doctor states that while my condition is managed, her practice requires recommendation of pharmacological treatment over supplement regimens. Virginia needs to recognize and legislatively allow the balance options of both allopathic and naturopathic treatments for its citizens.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few of my concerns. As medical care commonly requires specialized expertise in a wide range of fields, licensure inclusion of naturopathic medical should be allowed in the Commonwealth. Failure to so license naturopathic doctors, who have attained naturopathic medical degree credentials from accredited U.S. universities, is a gross disservice to Virginia's citizens.

**1) Risk of harm.** There are traditional naturopaths who call themselves naturopathic doctors, but who never attended or graduated from medical school. The public generally does not know the difference between these two types of providers. The lack of clarity in this distinction poses a risk to Virginians. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low risk, there needs to be the *same level of professional accountability and standards* as the other regulated health professions in Virginia. The Commonwealth needs to adopt accountability standards of many other states in which medically-trained naturopathic doctors are licensed for the safety of their citizens.

**2) Specialized skills.** Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.

**3) Autonomous practice.** Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medical providers do not have the same training and knowledge in both conventional and natural medicine. It is the same as seeing other medically trained specialist doctors, like Doctors of Osteopathy (DOs).

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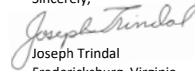
Letter from Joseph Trindal re: Support for Medically-Training Naturopathic Licensure

**4) Scope of practice.** Currently, Virginia's medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. From the patient perspective this creates an added burden - as patients need to then schedule an additional appointment with their primary care provider in order to access labs and basic medications. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services -- including prescriptions, such as basic antibiotics and anti-hypertensives. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.

**5) Economic impact.** Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Naturopathic medicine promotes holistic wellness through medically proven standards. Wellness prevents and mitigates disease thereby lessening the overall burden on our strained medical systems. Licensing would also pave the road to insurance coverage as it has in licensed states. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. Why should Virginia's citizens be denied access to levels of care afforded to citizens of so many other states? Medical doctors no more be expected to develop expertise in integrative care than they can be *expected* to have expertise in multiple medical disciplines. Licensure of medically-trained naturopathic doctors is right for the Post-COVID period and right for Virginia. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

  
Joseph Trindal  
Fredericksburg, Virginia  
e-mail: jtrindal@PoliceExec.org

91 224

On Fri, Aug 7, 2020 at 6:32 AM Cathy C <threeconnells@gmail.com> wrote:

Dear DHP representatives,

I write to you in regards to the licensure of Naturopathic Doctors in Virginia. Given my personal experience with two vastly different individuals that both use the term Naturopath, I think this is of utmost importance in ensuring Virginians have full transparency about the services they will receive. I have complex chronic health issues, and sought the help of a Naturopath in improving those conditions. The first Naturopath I worked with was a lay Naturopath that provided me options to the best of her abilities, what I did not realize was how limited those abilities were. After working with this particular Naturopath for about a year, and having limited progress and some set backs, I inquired about her training. When I found out she earned her degree online I was deeply disappointed. My expectations for quality of care could not be met with an online trained lay Naturopath. I did not realize that people could legally use the term Naturopath without medical training

I later did my own investigation and found a Naturopathic Doctor who had attended medical school, who has helped me achieve a level of healing that is nothing short of miraculous. I ask you to please have Naturopathic Doctors licensed in Virginia so that citizens can make an informed choice. I didn't know what I didn't know, and it cost me. I hope that greater transparency can be achieved through licensure. This would not only achieve cost savings for the public (I incurred significant costs for ineffective treatments with the lay Naturopath) but prevent harm and confusion to the public.

Regards, Cathy Connell, Roanoke, VA

From: Jeanette <jibarkerdc@hotmail.com>

Date: Sun, Aug 16, 2020 at 5:19 PM

Subject: Licensing medically-trained naturopathic doctors YES

To: [elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov) <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

August 16, 2020

Dear Members of the Committee,

My name is Jeanette Barker, I have been a District of Columbia resident for 32 years and I have been under the care of a naturopathic doctor for over 15 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

I've been living with a chronic condition for 20 years under care by a medical doctor and a licensed naturopathic doctor and the two approaches together have allowed me to thrive and continue working. My ND helps me cope with side effects from the MD-prescribed medicine that keeps me independent. It's very re-assuring that my ND graduated with medical training. Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because she is trained and helps with side effects of traditional medicine I must take.

Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. My MD and specialist are usually booked well into the calendar. Licensing would also pave the road to insurance coverage.

I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Jeanette Barker  
Washington, DC

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From: Song, Frank <[frsong@my.bridgeport.edu](mailto:frsong@my.bridgeport.edu)>

Date: Sun, Aug 16, 2020 at 5:31 PM

Subject: Board of Health Letter to License Naturopathic Doctors

To: <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

Hello Ms. Carter,

My name is Frank, and I have written a letter to the members of the committee in support of licensing Naturopathic Doctors. I grew up in Lovettsville, Loudoun County, Virginia and attended the University of Virginia in Charlottesville, VA before heading up north to obtain my Doctorate. I am currently in residency specializing in Lyme Disease in Vermont where we are licensed to practice as full primary care physicians, and I hope to return to my home state where my entire family currently resides to open a private practice.

Thank you for taking the time to read my letter and passing it along to all appropriate parties. Have a great week!

Sincerely,

Dr. Frank Song Jr. ND, MS  
Resident Naturopathic Doctor  
Sagehorn Community Health Clinic

August 12, 2020

Dear Members of the Committee,

My name is Frank Song Jr., and I am a recent graduate with a doctorate in Naturopathic medicine. I grew up in Loudoun County, VA and attended the University of Virginia in Charlottesville, VA before heading to Bridgeport, Connecticut to pursue my doctorate. My parents, grandparents, and extended family all live across the Northern Virginia area. I plan on returning to my home state to practice medicine in the future. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

I am currently in medical residency in Vermont specializing in Lyme Disease. I chose to go to Vermont due to the licensure and scope of practice in Vermont. I can practice as a primary care physician and prescribe basic pharmaceuticals. I am hoping to return to Virginia to bring what I've learned and my specialties to the community I grew up around. Medical licensure to doctorate level trained Naturopathic Physicians would have immeasurable positive impacts to Virginia on a public health, economic, and societal level.

As a patient, student, and now doctor who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Risk of harm.** (There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low-risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia. I am pursuing my residency in Vermont where I have been rigorously subjected to examinations and certifications to practice medicine at a doctorate level, Virginia would benefit greatly from creating distinction between doctors like myself, and practitioners without the same training I have received but using the same name.)

**2) Specialized skills.** (Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. While many of the healthcare services that NDs are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that aren't included or emphasized in other practices.)

**Scope of practice.** (Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count in the state of Virginia. They are not allowed by law to give a medical diagnosis for medical records, and must refer to another medical practice to access essential healthcare services that a patient would otherwise choose to receive from an ND. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services. I can currently do all the above-mentioned things in my current state of practice (Vermont) but also in the District of Columbia and Maryland. I believe, Virginia should be next to benefit from what medically trained naturopathic doctors have to offer to my home state.)

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need, including my friends and family who reside in Northern Virginia and my Alma Mater in Charlottesville. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,  
Dr. Frank Song Jr. ND, MS  
Lovettsville, Virginia

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92 228



Jody Rose Franko  
181 Zephyr Circle Se  
Floyd, VA 24091

August 16, 2020

Dear Members of the Committee:

It is with great pleasure and high hopes that I write to you today. I fully support and hope that your committee will support licensure for medically trained Naturopaths.

Our daughter, Cloe Franko, is a third year student at Canadian College of Naturopathic Medicine. She is pursuing a Doctor of Naturopathic medicine degree specifically because of her understanding and belief in the modalities used by NDs to care for patients' health.

As her parent I always knew Cloe had the intelligence and aptitude for medicine. Her academic career has been stellar. She graduated as the Valedictorian of her high school class. Later in College she excelled in sports and student government graduated Summa Cum Laude and a Phi Beta Kappa member.

It is important for Virginians have access to NDs. Licensure would encourage more NDs to practice across the state. I live in a very rural area and we are in need of NDs in this region of the state. I would be well cared for if Cloe could be my physician. I know many others in our region will have faith in her and choose to see her for healthcare.

Since licensure is the first step toward enabling insurance to support visits with NDs, your action will allow this excellent form of care to many more citizens.

I hope that you will support the licensure so Cloe can move back home to Virginia to pursue her vocation as a Naturopath able to practice with the full scope of skills used in her training. Not only is this advantageous for the community but will allow her to repay her student loans. Students who fund their education should not be at a disadvantage when their motivation is to serve others. Your support of licensure will affect a multitude of individuals and families, supporting NDs so they can support community health.

As I better understand the differences between lay NDs and Medically trained NDs I am in full support of that distinction be established so that the public can recognize the differences when choosing their healthcare professional. Healthcare is technical and I am not willing to trust my medical professional unless they are highly educated and trained in their field. Lay NDs do not meet the criteria that should ever be considered comparable to medically trained NDs.

Medically trained NDs should be licensed in order to reduce risk of harm to the public and increase accountability. Their specialized set of training and skills should be recognized and differentiated from other healthcare providers, including and especially lay naturopaths. Enabling NDs to practice the full extent of their training will meet the needs of many who do not choose conventional western medicine thereby increasing the wellness in our state.

Naturopathic medicine, just like all other medical professions, should have oversight to ensure accountability and public safety. I salute your dedication to health and hope you will choose to support Medically trained NDs to be licensed in Virginia. It will be a great day when this is so.

With respect,

Jody Rose Franko

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August 14<sup>th</sup>, 2020

To the Board of Health Professions,

My name is Dr. Brian Keenan, I am a naturopathic doctor who enjoyed working in Fredericksburg Virginia. I made the decision to move to Maryland to continue to build my practice because of the legal recognition and scope of practice that is available in that state. I believe this is a disservice to the people of Virginia, who desire and will benefit from working with naturopathic doctors who are clinically trained to work within the current healthcare model and offer their expertise in the increasingly utilized world of naturopathic medicine. In order to understand naturopathic medicine's role in the conventional medical model, it is paramount that naturopathic doctors understand the conventional system as well as the evidence relating to natural products and their employment in the overall health and treatment of individuals seeking this care. This can only be achieved through the current educational parameters that are in place for accredited naturopathic medical schools.

By choosing to license this profession in the state of Virginia, we will be expanding the group of providers that are able to diagnose and treat illnesses, as well as protect patients from the confusion between "lay naturopaths" who do not have any medical training, and naturopathic doctors who do. Additionally, licensure will allow naturopathic doctors in the state to finally be able to practice to the full scope of their training.

Thank you for your time and consideration reading this note. On a personal note, I hope that you decide in favor of licensing naturopathic doctors in Virginia so I can return home and practice in the state that I love and hope to serve to the full extent of my abilities as a naturopathic doctor.

Sincerely,

Brian Keenan, ND.

Brian Keenan, N.D.  
Magnolia Natural Medicine  
434 Bridgewater Street Fredericksburg, VA 22401  
T: (540) 324-8614  
www.MagnoliaNaturalMedicine.com

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Dear Member of the Committee

My name is Lorraine McCarthy, I have been a Virginia resident for 30 years and I have been under the care of a naturopathic doctor for over 8 years. I am writing in support of recommendation for licensure for medically-trained naturopathic doctors.

I saw a rheumatologist for undifferentiated connective tissue disease. They prescribed medication, but the side effects were way worse than the symptoms. I found a naturopathic doctor who listened to my concerns and conditions. My conditions improved tremendously with supplements and dietary recommendations. If naturopathic doctors could order lab work, I wouldn't have to go my rheumatologist just for lab work which puts unnecessary costs onto me as a patient.

Although seeing a naturopathic doctor has been very helpful to me, without insurance coverage it's been a financial challenge. Licensing naturopathic doctors serves as the first step to reducing the out of pocket expenses for me in order that lab work can be ordered as part of my visit and possible offices visits may be partially covered if I submit a superbill to my insurance company.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need, due to their role in preventative medicine. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia

Sincerely  
Lorraine McCarthy  
Aylett, VA

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August 16, 2020

Dear Members of the Committee,

My name is Moira Tokarick, I have been a Virginia resident for 6 years and I have been under the care of a naturopathic doctor for over 5. I am writing in support of a recommendation for licensure for medically trained naturopathic doctors.

I am pleased to have the opportunity to work with a medically trained naturopathic doctor as I have many adverse reactions to pharmaceuticals, which many primary care physicians seem to readily prescribe. I have through the last 20 years had several prescriptions written only to find I was severely allergic to them after taking one or two doses (e.g., vomiting, dizziness, tachycardia, ... to name a few of the side effects). It is a necessity to be able to work with a doctor who can find alternatives that I am able to take to support wellness.

As a patient who supports licensure for medically trained naturopathic doctors, here are specifics as it relates to two of the seven criteria.

**2) Specialized skills.** My medically trained Naturopathic doctor considers my health holistically. As previously mentioned, I have severe allergies to pharmaceuticals, specifically morphine and codeine derivative as well as pseudoephedrine. As an example, any time I have a cold and require medicine I am unable to find anything over the counter - this is also true for allergy medicine as I am only able to tolerate basic Benadryl. My naturopathic doctor recommends supplements and or changes in diet to enable my body to work for itself. I feel that she truly bridges the gap that exists between convention and traditional medicine practice to support my care.

**4) Scope of practice.** While my medically trained naturopathic doctor cannot offer physical exams or even run a basic complete blood count, she is the one that I take my results to for discussion about what may need to be altered in terms of diet or supplements. Neither my primary care physician nor my gynecologist for women's wellness exams (both of whom have order blood work for me in the past) have ever taken time to talk through the result with me. I must schedule with these doctors, get my lab work done, and reschedule with my medically trained naturopathic doctor to follow up. It is inconvenient and my wellbeing and overall health does not seem to be their priority. If I do try to engage in discussions with them, I am put off as I am not a doctor. I am an educated woman however and do take a very proactive role in my health. My naturopathic doctor understands this and respects this. That is why she is always my first call. I am requesting that medically trained naturopathic doctors have the same rights and privileges of other medically trained doctors. I respectfully urge the Board to recommend licensure for medically trained naturopathic doctors in Virginia.

Sincerely,

Moira Tokarick  
Vienna, Virginia

93 232

On Sun, Aug 16, 2020 at 8:51 PM Manisha Tare <manisha.tare@gmail.com> wrote:

Dear Members of the Committee,

My name is Manisha Tare and I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors. I support licensure for medically-trained naturopathic doctors for the following reasons:

Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.

Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. They are not allowed by law to give a medical diagnosis for my medical records, and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from an ND. This is not cost effective or patient friendly.

Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers.

Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.)

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Thank you for your consideration — it's especially in these times that we need holistic minded practitioners who can support patients on a mental, physical and emotional level.

Sincerely,

Manisha Tare

Belleville, NJ

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August 12, 2020

Dear Members of the Committee,

My name is Christopher Gilson, I have been a Virginia resident for 20 years and I have been under the care of a naturopathic doctor for over 15. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have.

**1) Risk of harm.** (There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low-risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia. As a patient, I also want to know that if an ND causes harm, they will be disciplined by a regulatory board with the authority to restrict a practice license – not just sued in civil court or reported to a business bureau.)

**2) Specialized skills.** (Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. While many of the healthcare services that NDs are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that aren't included or emphasized in other practices.)

**3) Autonomous practice.** (Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and knowledge in both conventional and natural medicine. I also trust my ND to refer me to a specialist or another healthcare provider, in order to ensure the best care possible. )

**4) Scope of practice.** (Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. They are not allowed by law to give a medical diagnosis for my medical records, and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from an ND. Medically-trained naturopathic doctors would be well equipped to provide these basic

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health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services.

**5) Economic impact.** (Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.)

**6.) Alternatives to regulation.** (There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient and a consumer, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities.)

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Chris Gilson  
Moseley, VA

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August 16, 2020

Virginia Board of Health Professions Regulatory Research Committee

Dear Members of the Committee:

The District of Columbia Association of Naturopathic Physicians (DCANP) is writing to support licensure for medically-trained naturopathic doctors in Virginia.

Naturopathic Doctors (ND) have been licensed in the District of Columbia since 2007. NDs are licensed by the Board of Medicine, a division within the D.C. Department of Health, Health Regulation and Licensing Administration (HRLA), which has the responsibility to regulate the practice of medicine in the District of Columbia. Our scope of practice is comprehensive to include complete physical evaluation, laboratory assessment, diagnosis and treatment, including minor surgery. We maintain our license with required continuing education. Currently, we are working with the D.C. Board of Medicine to expand our current prescriptive formulary to reflect our pharmacology education and training as primary care physicians.

As a jurisdiction that attained licensure for naturopathic doctors over 13 years ago, it is concerning to us that our counterparts just a very short distance across the border are unable to practice in accordance with their scope of training.

Lack of licensure creates public confusion and poses a safety issue; consumers seeking an ND would expect the same level of care in Virginia that they would receive in D.C. from a licensed naturopathic doctor. At present, because licensure is lacking in Virginia, lay practitioners with no clinical diagnostic or laboratory training call themselves a naturopathic "doctor". There is currently no way to distinguish levels of education, training and experience between provider types. Licensure is the only means capable of both ensuring the necessary clarity about provider type, as well as promoting safe access to care. There are many licensed naturopathic doctors who live in Virginia, but then have successful practices in D.C. due to its scope of practice.

It is also important to note that naturopathic medicine has a unique and specialized scope of practice. It is for this very reason that licensing is warranted. In practice, naturopathic medicine is a hybrid of conventional medical diagnosis with the application of natural therapies for treatment. NDs draw from a broad range of therapies that may overlap with other health professions, as is the case with many other licensed providers within Virginia. What sets a naturopathic doctor apart is their clinical diagnostic training, which is comparable to that of a medical doctor. NDs are well qualified to be able to identify when patients require a referral for emergency intervention, or to a specialist. Furthermore, it is this unique training and scope that make NDs fully capable of interacting cohesively within the healthcare system and only licensing would enable them to do this.

The DCANP, representing 61 naturopathic doctors, strongly supports licensing of medically-trained naturopathic doctors in the Commonwealth of Virginia and respectfully urges the Board to make a recommendation for licensure.

Please let us know if you have any questions. Thank you for your time and consideration.

Respectfully,

Dr. Natalie Boulware, DCANP President  
Dr. Anne Berkeley, DCANP Vice President

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On Sun, Aug 16, 2020 at 9:31 PM Donna Lucord <luvthegreenqueen@gmail.com> wrote:  
My position is that protections for unlicensed workers must be included in the law as it has been done in other states.

Thank you.  
Donna Lucord  
804-840-8832  
8157 S. Shall Dr.  
Mechanicsville VA 23111

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On Sun, Aug 16, 2020 at 9:31 PM Lindsay C <linzc.craig@gmail.com> wrote:

Dear Members of the Committee,

My name is Lindsay Craig, I have been a Virginia resident for 14 years and I have been under the care of a naturopathic doctor for 10 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

I have had several conditions where I ran into a dead end with conventional doctors. Naturopathic doctors have supported me over the years to explore different avenues into what might be the root cause. I also feel heard and less rushed in a way that I do not feel with conventional doctors that I have had. It is a different model that I believe should be used more with conventional doctors.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria:

**Risk of harm.** When I was first trying to locate naturopathic doctors years ago locally, it was rather difficult to be able to judge who was adequately trained since there was no licensing. I came from a state where they are much more regulated. There needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia. It is also important as a patient to be able to know if a naturopathic doctor causes harm, they will be disciplined by a regulatory board with the authority to restrict a practice license.

**Scope of Practice.** It is difficult to not be able to get physical exams, order labs or imaging from my naturopathic doctor. It requires more expense and effort on my end to coordinate with my primary care provider. I would choose to receive all of this from my naturopathic doctor.

**Alternatives to Regulation.** As a patient, it is incredibly important to me to have access to safe and holistic care that best aligns with my health needs and priorities.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Lindsay Craig

Charlottesville, Virginia

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August 3, 2020

Dear Members of the Committee,

My name is Megan Sills, I have been a Virginia resident for 44 years and myself and my daughter have been under the care of a naturopathic doctor for over 5 years. I am writing in support of full licensure for medically-trained naturopathic doctors. I was having severe and painful skin allergies, hair loss, hormone imbalance and mild depression. Once we got the skin allergies under control everything seem to start falling back into place. For my daughter, when she was an infant she had constant ear infections where the pediatrician suggested one more ear infection and we would need to put tubes in her ears. I consulted a naturopathic doctor and every time my daughter got the slightest cold, which would normal bring on a terrible ear infection, I followed the advice of the naturopathic doctor and her ear aches went away. I wouldn't have believed it myself if I had not lived through it. My mother was even amazed.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Risk of harm.** (There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. . There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia).

**2) Scope of practice.** Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs. This makes it difficult for the average patient, as we then need to schedule an additional appointment with our primary care provider to get the appropriate labs done. I understand that medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states. Virginians need as good of access to care as these other states.

**3) Economic impact.** Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also help with insurance coverage down the road. Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are able to offer.

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Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Megan Sills

Megan Sills

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## DR. DANIEL PUCKETT

191 Meadowlark Lane, Pembroke VA | 304-920-9896 | danielpuckett2012@gmail.com

Dear Members of the Committee:

My name is Dr. Daniel J Puckett and I am a pharmacist in the New River Valley. I have been practicing in Virginia for over 8 years and have worked in the field of pharmacy for over 12 years in rural areas across our country. I had a career change two years ago because I needed to get out of the chain setting and back to my roots to practice more as a "hometown pharmacist". I took this jump because I felt as a country, a state, and a corporation my previous employer had lost touch with the reason for my profession and healthcare. I am currently working in an independent pharmacy setting which allows me to provide direct consultations, medication therapy management appointments, immunization screenings and so-forth.

I grew up in the poorest of poor towns. I lived learning the health disparities rural people face. I know what it is like having your parents drive over an hour to their doctor. Currently, my parents drive almost two hours to their primary care physician. I chose a small pharmacy school in Oakwood, Virginia with their goal of improving access to rural Americans. While obtaining my doctorate, I was able to work with and learn from two wonderfully amazing Naturopathic doctors for three years. They were beaming lights of alternative therapies and provided great hands-on teaching behaviors that really honed my skills to be a direct patient care pharmacist. Being new to the healthcare team, I saw the benefit to these healthcare professionals as they had a diverse knowledge base ranging from natural remedies, nutrition and traditional drug therapies.

My newest job allows me to provide more access to patients, but sad to say, even after 8 years, things still aren't great in our area. I know our problem isn't just related to the New River Valley or Virginia for that matter. I have patients waiting weeks, months even before they can get to see a primary care provider. At my age, I am shocked that after 30 plus years, providers are still simply not easily available. For these reasons, and those listed below, I am advocating for Naturopathic doctors to be allowed to be licensed within the Commonwealth of Virginia.

It is imperative that Virginia join the other 25 states or provinces that have recognized the specialized skills that Naturopathic doctors have developed. They have an initial mindset of preventative medicine and practice with a whole-body approach. As I am sure you are aware, they graduate from a 4-year medical program and take a national licensing exam. Their education consists of nutrition, botanical therapies, and typical pharmacology. In addition, they are given the opportunity to commit to

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residency training that can range from 1 to 3-year programs. In addition, they can and do work with patients that have rare illnesses or those who have failed multiple therapies. I have had patients fail more traditional therapies and were forced to travel to northern states to seek alternative treatments.

This brings me to my second point, the economic impact paid by the patient and lost by the state. As in the aforementioned patient, they were forced to drive five to six hours one way to seek the alternative treatment. Virginians are paying more money for fuel and lodging because they can't obtain these visitations locally. Considering the healthcare crisis our country is facing, the system is under extreme stress. Many primary offices in my area are closed to routine visits and the ones open are backlogged for patients. If Virginia were to open the doors to allow Naturopathic physicians to become licensed, Virginia could see an uptick of revenue and patients could spend less money traveling and more money in Virginia.

Patients may be misled to think their provider is an officially trained individual due to the state not having a licensing protocol. By licensing Naturopathic physicians, we also better ensure that Virginians understand the difference between a "lay healer" and a true medical professional who has undergone rigorous education and training. By doing so, we can limit the risk of harm that may be done by someone who has no official degree in medicine. Lastly, when considering COVID-19, if a Naturopathic physician was licensed and practicing in the scope of physical exams, imaging and labs, they could be utilized to lighten the load across the state and provide better access to care and diagnostics.

Let us recognize the benefits of providing access to an additional medical source. A source which has undergone extensive medical education and training. A source which has a history of safety, efficacy, and cost savings through preventative treatments. Our healthcare of Virginia requires a multifaceted approach. Will you help us achieve our goal, a better, healthier Virginia through improved access? Thank you for taking time to read and consider my letter. Please don't hesitate to contact me if you have further questions or concerns.

Sincerely,

Daniel J Puckett, Pharm.D.,RPh.

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On Sun, Aug 16, 2020 at 10:52 PM Hannah Mannhardt <hannahmannhardt@gmail.com> wrote:

Dear members of the committee,

My name is Hannah Mannhardt, I have been a Virginia resident for over seven years now. I am writing in for the for approval for full licensure for medically trained naturopathic doctors. For over 10 years now, I, as well as my immediate family have personally benefited from using naturopathic medicine from a trained naturopathic doctor for various medical ailments and conditions

preventing visits to traditional Medical Doctors. When I was 16 years old I was under the care of a naturopathic doctor who developed a systematic plan in dealing with a chronic fatigue, digestive, and blood sugar issues.

It is my personal opinion that ND licensure in Virginia would benefit the public greatly in these areas:

1. Naturopathic doctors consider their patients health holistically. They bridge the gap between conventional and traditional medicine practice.
2. Naturopathic doctors offer treatment/ holistic services not offered by traditional medical doctors.
3. Naturopathic doctors could assist medical doctors and many basic functions such as physical exams, laboratory testing, and testing for COVID-19. This will alleviate much to the burden of other medical providers which are in shorthand.
4. Allowing naturopathic doctors licensure would also pave the way for insurance coverage of their services. In an era of chronic disease, Virginians need increased access to preventative healthcare services that medically trained naturopathic doctors are suited to provide.

Licensing medically trained naturopathic doctors will help provide safe health care for patients in need. I respectfully urge the board to recommend for licensure for naturopathic doctors in Virginia.

Sincerely,

Hannah Mannhardt

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On Sun, Aug 16, 2020 at 11:59 PM Shruti Paskar <spaskar@gmail.com> wrote:

Dear Members of the Committee,

My name is Shruti Paskar, I have been a Virginia resident for 26 years. I am a recently graduated naturopathic doctor from the National University of Natural Medicine, the oldest accredited naturopathic medical university in the United States of America and considered a medically trained naturopathic doctor. I have also been under the care of a medically trained naturopathic doctor for over 4 years.

I am writing in support of full licensure for medically trained naturopathic doctors, because my purpose for going to naturopathic medical school has always been to return to Virginia and serve my community with this much needed medicine. The chronic disease burden is just as high in Virginia as it is all over the country, and there is no reason in my mind to limit our community's health options. I have many friends and family members eagerly awaiting naturopathic medical care in Virginia and wish to provide them with the best care possible in line with my skills and training. And I have personally been successfully treated for migraines naturally under my medically trained naturopathic doctor in Oregon, without the use of pharmaceuticals and surgical implants as previous conventional doctors had tried to recommend.

I have spent the last 5 years completing a rigorous medical program in the state of Oregon, where naturopathic physicians have full scope to practice primary care medicine, prescribe legend drugs, and more. While that is only a component of what we do, I mention that to illustrate the breadth of our scope in a fully licensed state. Naturopathic doctors are trained in botanical medicine, homeopathy, nutrition, lifestyle/behavioral medicine, hydrotherapy, and physical medicine extensively, with the same depth and rigor as any other medicine/modality. We are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. And as we are extensively trained in both conventional approaches and natural medicine, we help bridge the gap that exists between conventional (MD/DO/NP etc) and traditional (ND/Chinese Medicine/Ayurveda/DC etc) medical practice, improving care coordination and reducing harm for our patients, especially those already under the care of several types of providers.

Many patients move to Virginia from licensed states, where they have been able to safely access care from medically trained naturopathic doctors. These patients - who expect the same level of regulation and scope in Virginia as their prior residence - end up under the care of a naturopath who has no medical training. There is risk of harm in all medical professions; while medically trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia. As a naturopathic doctor, I want to know that if a colleague causes harm, they will be disciplined by a regulatory board with the authority to restrict a practice license - not just sued in civil court or reported to a business bureau.

Currently, medically trained naturopathic doctors in Virginia cannot offer physical exams, or order labs and imaging; they cannot not even test for COVID-19 or run a basic complete blood count. We are not allowed by law to give a medical diagnosis for a patient's medical records and must refer to another provider to access essential healthcare services that I would otherwise have been able to offer them at the time of their visit. Medically trained naturopathic doctors are well equipped to provide these basic health care services (annual visits, physical exams, ordering lab work, etc.), eliminating the need for

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On Mon, Aug 17, 2020 at 6:25 AM Christine Abeel <chrisabeel@hotmail.com> wrote:

August 16, 2020

Dear Members of the Committee,

My name is Christine Abeel, I have been a Virginia resident for 44 years and I have been under the care of a naturopathic doctor for over 10. I am writing in support of full licensure for medically-trained naturopathic doctors. My naturopathic doctor is wonderful in that she looks at all aspects of my health and well being.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Risk of harm.** Of course, I would expect that my doctor has been trained and has a license. I am surprised that to learn recently that there are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia).

**2) Specialized skills.** I love the fact that my doctor does not automatically turn to the latest designer drug. Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice.

**3) Autonomous practice.** I love knowing that my doctor is trained in both conventional and holistic practice. Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and knowledge in both conventional and natural medicine.

**4) Scope of practice.** Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. From the patient perspective this creates an added burden - as patients need to then schedule an additional appointment with their primary care provider in order to access labs and basic medications. Medically-trained naturopathic doctors would be well equipped to provide these basic health care

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added appointments and reducing barriers to care. Many primary care providers are retiring, increasing the shortage of primary care providers in the state of Virginia. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide these medical services. Now more than ever we require medically naturopathic doctors to be able to help during this national healthcare crisis.

There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient and a consumer, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities.

I respectfully urge the Board to recommend licensure for medically trained naturopathic doctors in the state of Virginia. Licensing will allow for additional healthcare access and safe, natural medicine options for all.

Sincerely,

Shruti Paskar

Clifton, Virginia

--

**Shruti Paskar, ND**

Doctor of Naturopathic Medicine

National University of Natural Medicine '20

[LinkedIn](#)

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practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services -- including prescriptions, such as basic antibiotics and anti-hypertensives. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.

**5) Economic impact.** Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Yours,

Chris Abeel

Strings Teacher, Prince William County Schools

Cello, Fredericksburg String

Quartet <https://www.facebook.com/FredericksburgStringQuartet/>

Music at Unity of Fredericksburg [www.uofva.org](http://www.uofva.org)

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August 14, 2020

Dear Members of the Committee,

My name is Lisa Klein, I have been a physical therapist in Virginia for 18 years. I am the founder and head PT of Total Health Physical Therapy, offering physical therapy services in both Herndon, Virginia and Washington DC. I am writing today to support the regulation of medically-trained naturopathic doctors in Virginia through licensure.

As a PT trained in an advanced and highly specialized form of physical therapy known as Integrative Manual Therapy (IMT), I am often consulted with in chronic complex conditions that have not resolved with conventional western medicine alone.

For the past 10 years I have found myself working in collaboration with naturopathic doctors, as our work dovetails nicely, and together we are able to offer solutions in the most challenging of clinical cases. Because NDs understand that human organ systems operate holistically, they are also aware of the importance of addressing structure in treatment -for this reason we have a natural synergy in our approaches.

It is much easier for me to collaborate with my ND colleagues in DC where NDs are regulated through licensure as their scope enables them to order labs and the appropriate diagnostic imaging tests. In Virginia, we need to seek out a third party for these basic and common tests. Because this is cumbersome, costly and time inefficient, it is a disservice to the constituents of Virginia.

As you are most aware naturopathic doctors are trained as primary care providers, and their scope should reflect such training. Licensing is the most appropriate level of regulation for medically-trained health care professionals.

I urge the Board to vote in favor of licensure for naturopathic doctors during their review process, and I look forward to being able to support them again in the 2021 legislative session.

Sincerely,

Lisa Klein, PT

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Additionally, I have a personal example. After losing a job, I was forced to postpone my appointment with my ND by a month and a half due to financial constraints. Within this 45 day period, my mental and physical health plummeted dramatically. Even though I knew I needed the care from this appointment, I could not realistically afford to go. Had my care been covered under insurance, I would have been able to see my ND at the opportune time and not experience a major health set-back that has now elevated the level of care that I require.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Sarah Guidry  
Henrico, VA 23231

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August 16, 2020

Dear Members of the Committee,

My name is Sarah Guidry, I have been a Virginia resident for 1.5 years and I have been under the care of a naturopathic doctor for over 20 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

Receiving naturopathic care has helped me more than any Primary Care Physician or Specialist ever has. When I was 8 years old, my parents brought me to a medically-trained Naturopathic Doctor after years of suffering through chronic migraines and visiting countless Doctors and Specialists. It was only after undergoing the care of my ND that my chronic migraines finally found relief. When I was 18 years old, I had a very traumatic near-death experience with MRSA Staph Infection. For two years after this experience, I continued contracting this infection. Through years of intense antibiotics, my physical health and mental health reached an all-time low. I visited many Doctors to address my issues, only to be given more drugs that caused me more harm than good. I developed a plethora of crippling ailments. It wasn't until I visited my ND that I finally cured my many severe internal issues due to years of antibiotics destroying my system. Lastly, one year ago, after suffering through extreme depression and anxiety caused by both PCOS and PMDD, I once again found relief and optimal health through the care of a medically-trained Naturopathic Doctor. My whole life Doctors practicing traditional medicine have failed to improve my health or made matters worse. Naturopathic work has been the only practice to actually help me and optimize my well-being.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**Specialized skills** - After being diagnosed by an OBGYN with both PCOS and PMDD, I felt very unsupported by my conventional Doctor. I was told the only way to help my symptoms were to take anti-depressants and simply "eat a healthy diet," which I was already doing. This did not work for me. This level of "care" brought me to my most recent medically-trained ND. Her expertise in hormones has helped me tremendously! Both my mental health and physical health has drastically become stronger since being under my ND's care. I truly believe that I wouldn't receive the same results with someone who wasn't a specialist in the very complicated and fragile field of hormones. It would be very frightening to think what my outcome would have been if I became a patient for a Naturopath who wasn't medically trained or hadn't had the education/training in the field of hormones.

**Economic impact** - Being that Naturopathic doctors cannot be properly coded for possible insurance coverage, patients are forced to choose between conventional forms of care or paying out of pocket for naturopathic care. By making alternate forms of care available provides the first step for coverage by insurance companies; the patient could now spend their hard-earned money on other healthy lifestyle choices. This could free up funds for gym memberships, a healthy diet, or a new outdoor hobby; all of which would benefit the individual as well as the community.

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On Mon, Aug 17, 2020 at 11:54 AM Bridget Vander Woude <bridgetvanderwoude@gmail.com> wrote:

August 17, 2020

Dear Members of the Committee,

My name is Bridget Vander Woude, I have been a Virginia resident for my whole life and I am a newly graduated naturopathic doctor. I am writing in support of full licensure for medically-trained naturopathic doctors. In 2019, I graduated from a 4 year, nationally accredited, naturopathic medical school in Tempe, AZ. I have since returned to my home in Virginia and am anxious to begin practicing my profession and offering my care to the residents of Virginia. I currently hold a license to practice naturopathic medicine in Washington D.C. and must have patients travel from VA to DC in order to receive care. Without licensure in Virginia, naturopathic doctors and their patients will continue to take their business out of state. However, with licensure of naturopathic doctors in Virginia, I could more readily serve the people in my local community while also promoting the growth of small businesses and our local economy. Please help me help our residents and our economy by licensing naturopathic doctors!

Additionally, the student loans associated with any medical training are significant and play a large role in determining where a naturopathic doctor practices upon graduation. Many new doctors, such as myself, have no choice but to work in a licensed state where they can earn an income sufficient enough to pay back their debt. I love my hometown and I am proud to be a resident of Virginia. All of my (very large) family lives here and I would love nothing more than to get to stay here and support myself.

As both a patient and a provider who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Risk of harm.** There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia.

**2) Autonomous practice.** Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. Having attended naturopathic medical school in the fully-licensed state of Arizona, I have been trained to provide comprehensive care as an autonomous provider. I am able to practice autonomously in neighboring Washington DC and I have passed national board exams to prove my competency.

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Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,  
Bridget Vander Woude, ND

Re: Letter of support for Naturopath Licensure

Greetings Dr. Elizabeth Carter, & Committee Members:

I am a board certified licensed clinical psychologist practicing in Richmond, Virginia as well as Washington DC and North Carolina. I have been a resident of the great Commonwealth of Virginia for 10 years. While attending graduate school in Washington state, I had the wonderful experience of being treated by a Naturopathic Doctor (ND) for approximately five years. She served both as part of an overall team and as a singular contributor to my health. Her name was Dr. Molly Brignall and she saved my life.

To explain, for a few years I suffered with the effects of hypothyroidism. I saw several allopathic physicians during that time and they completed all of the various tests. Repeatedly, they ignored the constellation of symptoms as well as the test results that showed my TSH levels did indicate hypothyroidism, but it was still near the range of normal. They kept suggesting that I was psychologically depressed and I only learned about my results after pressing the allopathic physician to review the lab results with me. It was around this time that I learned about the existence of Naturopaths. I saw Dr. Brignall and she completed a thorough examination and outlined a holistic treatment plan that included addressing the true root of my physical complaints. Her treatment process worked quickly and wonderfully. Of note, Naturopaths are licensed in Washington and were covered by my insurance. She had a full caseload, but she took the time to review everything with me. Within a very short time of addressing the real issue my life began to change substantially and it is my firm belief that Dr. Brignall saved my life in more ways than one.

While traditional approaches are valuable and useful to address the broad array of issues, there is a need for a diversity of perspectives when addressing the unique needs of the population. The need for a diversity of perspectives and approaches is highly important and could not be more evident than now- given the zeitgeist. I am sure that you all are as aware as I am that not all patient issues will conform to standard avenues of practice and not all patients are comfortable with traditional approaches of practice. It is my firm personal and professional opinion that this great Commonwealth would be served well when it embraces the naturopathic field and allows them to appropriately practice as a valued member of the treatment team!

I fully support licensure for medically trained ND's. I also understand that there are six criterion that are reviewed when considering the path for licensure of health professions.

- 1) *Risk of harm:* There are folk healers and herbalists who call themselves ND's, but have had little to no formal medical training and have not attended a medical school. Given that I know the public frequently confuses psychiatry with psychology, their ability to understand the lack of qualifications of such people is likely limited. They may falsely believe that such individuals are safe and have been appropriately vetted by Commonwealth authorities. Additionally, if and when a person is harmed by such poorly trained practitioners there is little to no recourse

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for them to address the issue and protect others. Furthermore, such practitioners have no oversight and very limited guidelines for practice. Also, it is highly important to consider that many residents of Virginia, like myself, come from states that license ND's and automatically assumes that those calling themselves ND's in the Commonwealth are licensed, had been vetted, and are monitored here as well. I have a serious concern both as a consumer of the naturopathic services as well as a health professional that we do not have this oversight in Virginia.

- 2) *Specialized skills:* From my experience, I benefited greatly from the naturopathic approach. Dr. Brignall considered numerous aspects of my physical, psychological, and sociological symptom profile and was able to holistically arrive at an accurate case conceptualization. When I questioned my allopathic physician why we were not addressing the hypothyroid issue, he focused on only one aspect of my symptoms and that was that the lab result was close to the normal range. Like all the other allopathic doctors before him, he ignored all other aspects of my clinical picture and explained away the lab results and continued to insist that I was psychologically depressed and pressed me to take antidepressant medications, which I did not need. Dr. Brignall's knowledge base also included an awareness of drug/herb and drug/nutrient interactions and how such things can bring about beneficial change for her patients. I benefited greatly from this knowledge, which is unique to ND's. She had an in depth knowledge of medical conditions and bodily processes and a perspective that substantially added to my ability to not only recover from my condition but to improve/thrive in my life in other ways not emphasized in other approaches to medical practice.
- 3) *Autonomous practice:* In my experience, Dr. Brignall practiced autonomously and actively participated in my overall treatment team alongside other providers to include allopathic physicians to address all of my healthcare needs. While I preferred to see her as my primary care physician, she did not hesitate to refer me to a specialist to address a unique issue. I chose her because she could conceptualize my conditions through a unique and more complete/accurate manner than my previous, more traditional, physicians did. I trusted her to guide me to the appropriate treatment options and she never failed me.
- 4) *Scope of practice:* Currently, appropriately trained ND's can't order specific labs or imaging services. Additionally, they cannot even test for the coronavirus or run a basic blood panel. In the Commonwealth, they are not even allowed to offer a diagnosis for medical records. From my experience with Dr. Brignall and other members of her naturopathic clinic in Washington, she was well-equipped and trained to provide the full scope of services and did so without the need for added steps or oversight. This substantially improved my ability to receive care in an appropriate amount of time. With so many providers being stricken by the coronavirus as well as retiring from service the need for appropriately licensed ND's has never been greater. Many providers, including myself, are facing added burdens because of the pandemic and given ND's have more training and understanding of the intersection of psychology and physiology, their unique perspective and skill set is highly needed to reduce the burden on all of us, including the general public.
- 5) *Economic impact:* Allowing the licensure of appropriately trained ND's would easily improve access to care and contribute to a reduction in overall costs in care. When more providers

are available, it is easy to understand that economic competition can reduce costs as well as improve efficient service provision. A licensed ND's could bill insurance for their services and this would substantially reduce the economic burden on those seeking their unique skill set. Additionally, ND's hold the firm belief that an ounce of prevention is worth a pound of cure and this is also very cost-effective. With licensure, Commonwealth citizens will have increased access to preventive healthcare services that are emphasized by the unique skill set of ND's. Additionally, they are more trained in the use of, and also prone to utilize the services of mental health providers that numerous studies have shown substantially reduces overall cost to insurance companies and the community when addressing chronic diseases like diabetes that almost always needs a behavioral health type intervention.

- 6) *Alternative to regulation:* I do not know of any other alternative to regulating the licensure of ND's. As mentioned, I had no idea that ND's were not licensed in this great Commonwealth until I recently sought out their services and I do not understand the reasoning behind not licensing them previously. I just assumed that they had this needed level of oversight because their usefulness has been proven beyond all doubt to me from my experience as well as my review of the available literature. As a consumer of such services as well as a behavioral health provider, I think there is a very real harm in not regulating this much-needed avenue of healthcare provision. As a professional, I also want to be able to know that when I refer an individual to a naturopath, which I have done numerous times, that such an individual has been appropriately vetted and has ongoing oversight by our government.

The licensure of appropriately trained Naturopathic Doctors who have completed accredited medical programs is sorely needed in our great Commonwealth. Our health system is being substantially stressed by this pandemic and there is no end in sight. Even before the rise of the coronavirus, the need for their unique perspective and skill set was high. Licensing them will provide additional vetted/safe healthcare options for Virginians. I respectfully request that you Dr. Carter, and the other members of the board of health professions, recommend licensure for naturopathic doctors in the great Commonwealth of Virginia.

Please feel free to contact me at my clinic's number of (804) 594-3690 should you have any additional questions.

Respectfully submitted,  
Alan T. M. von Kleiss, PsyD, ABPP CSOTP  
Board Certified in Clinical Psychology  
CEO: Advanced Behavioral Health Services, LLC  
Chief Psychologist: Chippenham, & Johnston Willis Hospitals  
Neuroscience, MS-Trauma ICU, & Rehabilitative Medicine Units

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August 17, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Hanna Schmittat ND, LAc, Dipl Ac (NCCAOM). I have been a naturopathic doctor for over 4 years.

I am writing in support of full licensing of medically-trained naturopathic doctors. I have been practicing in both Virginia and Maryland for the past 2 years. As a Licensed Acupuncturist, I have had the opportunity to help people in acute and chronic pain using Acupuncture, but with its limitations. If any of my patients needed lab work, I'd be able to order them easily in Maryland, as a licensed naturopathic doctor. You can imagine the frustration and disbelief of my patients when I tell them to schedule a visit with their other licensed doctor, who may or may not decide to run their labs for them. If the primary care doctor has a difference in view, it is often the case that they refuse to order the labs or will only run a portion - providing an incomplete picture. It is not uncommon for it to require 2-4 additional visits to get the needed labs; costing time, money, and creating additional frustration in the patient's busy life. Oftentimes, the patient will have to drive up an additional hour or hour and a half to my Maryland office - for me to run the appropriate labs.

Licensing would help increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. As I described above, due to limitation of access to licensing, many of my patients will drive 1-1.5 hours to visit my Maryland office, when they could be visiting my Alexandria VA office within 15 min of a drive. As a naturopathic doctor who wishes to practice to the full scope of my training, and provide the help that patients need and deserve, I find myself having to ask patients to put their time and financial resources into bordering jurisdictions.

As an Acupuncturist who takes insurance, I understand the desire for people to run their labs and their visit through insurance, especially if they have checked and know that insurance would cover a lab test, if scripted by a Licensed Naturopathic doctor in Maryland. Without the ability to obtain insurance coverage, many Virginians (including many who don't have access to available care in Virginia), are unable to access -or will have to drive up to 1 – 1.5 hours across neighboring jurisdictions to get access to the preventative services of the naturopathic doctors in those licensed jurisdictions where they are so well positioned to be able to provide the necessary preventative care.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

Sincerely,

Dr Hanna Schmittat, ND, LAc, Dipl Ac (NCCAOM)

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August 17, 2020

**Dr. Elizabeth Carter:**  
elizabeth.carter@dhp.virginia.gov

Re: VA AAP's Written Public Comment on the Review for the Need of Regulation of the Practice of Naturopathic Doctors in the Commonwealth of Virginia

To the members of the Regulatory Research Committee, the Board, and the staff at the Virginia Department of Health Professions:

The Virginia Chapter of the American Academy of Pediatrics opposes the licensure for naturopathic providers. We align ourselves with the comments submitted by the Medical Society of Virginia. We also have serious concerns about patient safety, specifically for patients under the age of 18.

Treating children is much different than treating adults. As pediatricians, we are required to do our residency in pediatrics for at least three years after medical school. Pediatric specialists undergo an additional one to three years of training after this. With that said, we believe the training naturopathic providers receive is considerably less rigorous than the training for pediatricians in allopathic/osteopathic medicine. There is no standardized admission testing and postgraduate residency training in the care of children is optional.

Our concern is that if the Commonwealth chooses to license this profession, parents will falsely believe this type of care is sufficient for their child. The annual well visits that children currently receive with their pediatrician are critical and ensure that families receive important preventive care including vaccinations, developmental milestones, screening for mental health, nutrition, sleep, behavior and physical issues. We are concerned that children would instead go to naturopathic providers, who are not trained to provide this care, and potentially serious medical issues could be overlooked.

We respectfully ask that you do not recommend licensure for naturopathic providers and urge you to consider how treatment of patients under the age of 18 would be included in any recommendations for regulation.

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August 16, 2020

Dear Members of the Committee,

My name is Shelley Painter, and I am a Virginia resident. I am writing in support of a recommendation for licensure for medically trained naturopaths in my state of Virginia.

Why should I have to travel an hour plus or as many as 4-5 hours to a state that has medically trained naturopaths? The state of Virginia has sadly not recognized the benefits of a non pharmaceutical approach to medical conditions. Recently, I learned that I have the genes that do not tolerate medications well. Naturopaths (a 4 year degree) are extensively trained in conventional and natural approaches and specifically trained in drug-herb and drug-nutrient modalities.

Hopefully living in a free country with the freedom to select the holistic methodologies (allopathic, naturopathic, and/or homeopathic) that I feel will best benefit me, I respectfully ask that you urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Ann Shelley Painter  
Fredericksburg, VA 22406  
shelleypainter@yahoo.com

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On Mon, Aug 17, 2020 at 12:56 PM Debbie Austin <dahs10@verizon.net> wrote:  
I am a member of Virginians for Health Freedom and I believe every Virginian has the right to choose their health care provider and their health care path. I also believe Natural Health does not pose a risk to the public. Our position is that any law creating licensure of Naturopathic Doctors in Virginia must provide exceptions and protection for those unlicensed workers who do not pose a risk of harm to our citizens

This bill wants to give the designation of Naturopathic Doctor to certain individuals and to license them. Many of us Virginians have had the Naturopathic Doctorate for many decades before these schools were even around. This bill is negating my degree that I earned and only giving credence to the individuals who have been to school recently. If you want someone to license, please give them a different title. Perhaps a Holistic Naturopathic Doctor is a better title to be licensed. Requiring traditional naturopaths with a doctorate to have to go to one of these expensive schools to learn drugs and procedures that we don't believe in just so we can keep our degree title is unrealistic. It is also unrealistic and unfair to take away the designation we were granted after fulfilling the degree requirements of our schools. Requirements that were around before legislators decided to get involved. There are doctors of education, doctors of business and doctors in many other areas and their degree titles are not being threatened.

The past studies have shown that licensing naturopaths is not necessary. If these "new naturopaths" want to play doctor, then give them a different title and have them licensed under the medical authorities (either the nursing board or doctor board) but leave the traditional naturopaths who only use alternative health practices alone.

If you are determined to license these folks, then allow for exceptions to protect those of us who "do no harm" with our natural health practices and supplements.

Thank you

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On Mon, Aug 17, 2020 at 1:05 PM Brooke Atkinson <beautiful-birth@hotmail.com> wrote:

August 17, 2020

Dear Members of the Committee,

I am writing you to urge licensure of Naturopaths in VA. I could spend a lot of time going over all the reasons they should be licensed, but to me it all boils down to what I believe are human rights. To me, people have the basic right to autonomy. They should have easy access to the care provider of their choice. Licensure ensures that people know if they are currently hiring a licensed naturopath, or someone who works in natural medicine, but isn't a medically trained naturopath. There is a big difference and people have the right to know. Anyone who goes to school long enough and trains hard enough to have "Dr" in front of their name deserves the respect of a state license. Please support the right of people to make their own health care decisions and with the provider of their choice. Thank you for reading my letter.

Sincerely,  
Brooke Atkinson

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On Mon, Aug 17, 2020 at 1:13 PM Lynne Wood <shanti48@cox.net> wrote:

Members of the Committee:

I am writing to support the licensure of medically-trained naturopathic doctors in Virginia. I have lived here for 28 years and have a long and complex medical history. Medically-trained naturopathic doctors have proven to be most valuable in my health journey. But I had to drive to Washington, D.C. to find such a naturopathic doctor who was licensed to practice. There are naturopaths in my area, whom I know and respect, but since Virginia does not license them, they are not able to provide many services, such as blood work and other tests. They have *many* areas of expertise that are not addressed by allopathic physicians, especially non-pharmaceutical approaches. I have learned that I am extremely sensitive to drugs and only take them as a last resort, which requires a doctor with well-rounded expertise, such as a naturopath.

I have had to juggle my needs among many allopathic doctors who cannot meet my needs for holistic approaches, such as nutrition, herbology, homeopathy, recommendations for bodywork and emotional and spiritual work, etc. This adds additional stress to my already complicated health challenges. If I want to avail myself of the expertise of a medically-licensed naturopath, I have to drive to another state.

I have wondered for many years why Virginia does not license medically-trained naturopaths. Is it because the licensure agency supports the pharmaceutical industry?

Please urge the Board to recommend that medically-trained naturopaths be licensed. Such licensure will provide safeguards for those of us who require a more wide-ranged approach to healthcare.

Sincerely,

Lynne Wood  
Fredericksburg, Va. 22405

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August 17, 2020

Dear Members of the Committee:

I am a retired veterinarian who has lived in Virginia for the last 19 years. I was previously licensed in Missouri and Puerto Rico. The focus of this letter is to support and recommend licensure for naturopaths who are medically trained in accredited naturopathic medical schools.

Over many years in practice and in personal experience, I have learned that medicine is an art as well as a science. I have also learned that there are many modalities to approach "the healing process." Recently, I have used a number of homeopathic remedies for allergies, sleep, and a canker sore, with very good results. Naturopaths are more acquainted with homeopathic remedies than are allopathic physicians. The naturopathic doctor would also have the training to refer the patient to the appropriate allopathic doctor, if needed.

In a climate of reduced medical staff and greater need for medical care, Virginia can only benefit by licensing the naturopaths in its state. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Dr. Arnaldo Vaquer, DVM, MA, MBA  
Fredericksburg, VA 22406  
arnaldovaquer@me.com

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Alison Drake  
81 King Carter Drive  
Irvington, VA 22480

August 14, 2020

Re: Recommend licensure for medically-trained naturopathic doctors.

Dear Members of the Committee,

My name is Alison Drake, I have been a Virginia resident for 23 years and I have been under the care of a naturopathic doctor for over 7 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

My health and quality of life has improved immensely from working with a medically-trained naturopathic doctor. My naturopathic doctor not only helped me regain health after cancer but helped me achieve a higher level of health than before. I no longer need or use the five prescription drugs I was taking. I cannot say enough positive things about how my life has changed and improved. I know this would not be possible without an ND with the medical training and skill that mine has. I feel fortunate to be under her care and wish for others to have the same opportunity.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

**1) Risk of harm.** There are traditional practicing naturopaths who call themselves naturopathic doctors, but who have no medical school training. Most people do not know the difference between these two types of providers. I find this all the time when I talk to friends and acquaintances about my experience working with my naturopathic doctor. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. The issue becomes that many of these patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low-risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia. As a patient, I also want to feel confident that if an ND causes harm, they will be disciplined by a regulatory board with the authority to restrict a practice license - not just sued in civil court or reported to a business bureau.

**2) Specialized skills.** Naturopathic doctors look at the whole person and consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. Given they are extensively trained in both

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conventional approaches and natural medicine, they help bridge the gap between conventional and traditional medicine. While many of the healthcare services that NDs are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that aren't included or emphasized in other practices and therefore not available through conventional medicine.

**3) Autonomous practice.** Naturopathic doctors are able to practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and knowledge in both conventional and natural medicine and therefore cannot offer me the same care and results. I absolutely trust my ND to refer me to a specialist or another healthcare provider, if needed in order to ensure the best care possible.

**5) Economic impact.** Licensing medically-trained naturopathic doctors would reduce the burden on our existing, overextended healthcare system by allowing access to more patients. Licensing would also pave the way to insurance coverage not currently available. Given the amount of chronic disease in this country, often disproportionately affecting those least able to afford healthcare, the health of Virginians could be significantly improved with access to medically-trained naturopathic doctors, ultimately reducing the cost and burden on the healthcare system. My own experience proves this. All Virginians deserve access to the preventative healthcare that medically-trained naturopathic doctors are so well suited to provide.

**6.) Alternatives to regulation.** There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. For the benefit of many, I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Alison Drake  
Irvington, VA

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not only welcome, but where we also excel. This unique bio-psycho-social approach to primary care with a focus on prevention using lifestyle, natural medicine, while emphasizing use of the least invasive and most effective treatment first, is the naturopathic doctor's specialty. No other primary care providers have the level of specific training in this approach or in natural medicine as naturopathic doctors. We bring traditional medicine to the conventional; we not only bridge this gap, but help to fill it. And there is a dire need in medicine for this approach – especially now, as we are learning these chronic diseases (the majority driven by lifestyle factors) are also increasing risks for patients amid the coronavirus pandemic.

In 2016, Nova Medical Group was acquired by Inova Medical Group. Directly due to the lack of licensing for naturopathic doctors in Virginia, Inova was unable to credential me as a naturopathic doctor within their health system. Licensure is requisite for credentialing. They were interested in credentialing me as an acupuncturist, but this would have limited my scope and impact significantly, to only acupuncture services. After investing six years of my professional life hoping to be able to make an impact in a larger health system only to have those dreams shattered because of lack of licensing for NDs in Virginia, I was heartbroken. This was quite a difficult time and transition. I had spent these years building up a base of patients who knew me and valued our patient/provider relationship, only to be left with two options: 1) Relocate to a state that recognizes my credentials as a naturopathic doctor and has a licensing framework in place; or 2) Open my own practice here in Virginia, despite the number of challenges of being in a state that does not yet recognize my naturopathic doctor credential. At that time (2016), I had a new baby and my husband was out of work. It was not an ideal time for us to relocate. It was also not ideal to start a practice but having always been up for a challenge and having my patient base established, we decided to stay here in Virginia.

In 2018 I started my solo practice, Collective Health Center, in Leesburg, Virginia. I continue to be referred complex patients from many of my medical colleagues – not only at Inova Medical Group, but from other primary care and specialty offices. However, as at Inova approximately 30% of patients I saw were referred, a large portion of my patients presently (50%) are now self-referred. Since I am unable to order labs, I do my level best to communicate with consultation notes to share with a patient's primary care providers; however, I do not always have established relationships with all of their providers, and sometimes these providers are not willing to order the labs or to consider other ideas I may have suggested for our shared patients. I cannot blame them; it is truly odd for me to ask another provider to basically do my job for me, when they do not yet know or trust me, and also when I am well-equipped to be able to offer these same basic healthcare services. Professional licensing helps to establish a foundation of trust from one healthcare provider to another, and for a patient to another provider, while also defining a scope of practice that is more in line with the provider's education and training. Without this, it can be a challenge (to say the least) to be trusted within the context of the broader healthcare community.

Sadly, this creates a significant burden for our patients as consumers, and to me as a clinician and business owner. For patients, they do not always know the difference between a medically-trained and traditional or lay naturopath when seeking out care. (Details of harm directly related to this

Sarah Giardenelli, ND, MSOM, LAC  
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Leesburg, VA 20175  
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August 17, 2020

Dear Members of the Committee,

My name is Sarah Giardenelli. I am a naturopathic doctor (ND), acupuncturist, and owner of Collective Health Center in Leesburg, Virginia. Additionally, I am also the President of the Virginia Association of Naturopathic Physicians (VAANP). The VAANP Board has submitted detailed written public comment, and I also offered oral comments on behalf of the VAANP during the August 11<sup>th</sup> meeting. I appreciate the opportunity to follow up with personal written comments in support of licensing. Firstly, I'd like to extend my heartfelt gratitude for the diligence of Dr. Carter, Ms. Jackson, and the Committee, for your time, research, and interest in the regulation of medically-trained naturopathic doctors in Virginia.

Nearly 10 years ago, after completing my Council on Naturopathic Medicine (CNME) approved naturopathic residency, I was recruited for employment as a naturopathic doctor and acupuncturist at Nova Medical Group in Loudoun County, Virginia. Nova Medical Group was the largest integrative, multi-center, primary care medical home in Virginia, and I was privileged to work as an integral member of the integrative medicine team. As a recent ND graduate, I welcomed the opportunity to work in this team environment, gain experience, and relocate to Virginia to be closer to my sister. Despite Virginia not yet offering a practice license for naturopathic doctors, the pros as a new graduate were high; I also thought that change was surely on the horizon for licensing in Virginia, and that I could be part of this important process. I have been steadfast in my efforts to support the advancement of my profession in Virginia since this time, not only through advocating for licensing, but additionally by spearheading several continuing medical education activities for my colleagues through the VAANP platform – including: ethics, pain management, and drug-herb interactions.

At Nova Med, many of the patients I saw were referrals from my primary care colleagues (MDs, NPs, and DOs). My colleagues were happy to refer patients to me, specifically because they knew that as a naturopathic doctor, I possess specialized skills and training in lifestyle medicine, which was foundational to the treatment of a majority of their patients with chronic diseases, such as: diabetes, heart disease, and obesity – many of them on polypharmacy. They trusted my expertise in botanical and nutritional supplements. Naturopathic doctors are the only doctors given specific training in drug-nutrient and drug-herb interactions.

Other medical colleagues would also refer to me their most complex patients, who had failed the treatments of the number of other medical specialists. I became skilled in supporting such patients in regaining their health holistically, with clinical nutrition, lifestyle optimization, botanical medicine, and nutritional supplements – all while considering the underlying medical and physiological components of these cases. This is the challenge that my naturopathic colleagues and I

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confusion are detailed in the AANP and VAANP written comments.) And for me as a provider: while I can and regularly do help patients with my current tools, it is not efficient or effective to be limited in this way – to be practicing with one hand tied behind my back. While I have done everything in my power to build strong and trusted relationships with as many of my medical colleagues as I can, I should not have to go through the gymnastics I do every day, simply to help patients access labs or other routine healthcare services that I am well-trained to provide.

When patients call to inquire about services or to schedule, my office is fully transparent about the current limitations in Virginia for NDs. Patients are often dismayed and disappointed by the limitations, and many times choose not to schedule appointments. These patients would like to see a naturopathic doctor who can offer the realm of primary care and other healthcare services that they were trained to provide. Given that NoVA is a transient area, many of those who call inquiring about available healthcare services are transplants from other states where naturopathic doctors are fully licensed. They are often confused as to why Virginia would be so behind the curve in terms of holistic medicine offerings, especially compared to neighboring DC and Maryland – both of which license NDs. They wonder why I cannot even provide them a basic itemized receipt with proper evaluation and management codes, that they would be able to submit to insurance. I must regularly explain that I am unable to render medical services as a naturopathic doctor in Virginia due to lack of licensing.

As you might imagine, the barriers created by lack of licensing are not ideal for business. I named my practice Collective Health Center, in part, because I hope for expanding my solo practice to a health center model in the future. However, without a practice license, this may not be possible for me in Virginia. Like all healthcare professions, the burden of my medical school loans is heavy; I am glad to shoulder this burden that enabled my education, but it would be much easier to do so while being able to serve patients with a scope of practice more in line with the knowledge and skills that medical education provided.

In my four years at Nova Med and two years at Inova, I practiced in the same office as my medical colleagues, but with autonomy. As a trusted team member, my medical colleagues would assist with labs and other recommendations that were outside of the scope allowed by law, but they were not overseeing my practice in any other tangible way. Patients and providers both enjoyed being housed together in a primary care medical home, where collaboration was organic and easy. Naturopathic doctors practice autonomously in all 25 jurisdictions where they are regulated, regardless of whether they work in a solo or group practice model.

When regulation and licensure has been evaluated in the past, the criteria for "risk of harm" has (rightly) been viewed as a primary gatekeeper. The disciplinary action data from the Federation of Naturopathic Medical Authorities (FNMA), and from cases detailed in both the AANP and VAANP's written comments, highlight the present, real risks that exist. While medically-trained naturopathic doctors are overall safe providers of healthcare, there is no question that risks exist. As mentioned in my oral public comment, the case of an ND in Virginia Beach still weighs heavily on my mind because it appears this ND is still seeing clients, due to lack of regulation in Virginia that would

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allow for adequate disciplinary action. There are no alternatives to regulation that both protect the public and enable safe access to the range of healthcare services that naturopathic doctors are well-equipped to provide. NDs want to be held accountable to professional standards.

Medically-trained NDs desire to be a part of the broader medical community in Virginia. We can better and more safely serve our patients when given the authority and scope to do so. (Naturopathic doctors are currently the only O\*Net Job Zone Five doctors that do not have a practice license in Virginia.) It is a tremendous burden upon myself, my patients, my family, and my colleagues to continue without a practice license for naturopathic doctors in Virginia. The other reason for naming my practice Collective Health Center, is that my mission is to optimize the health of my community one patient at a time. Licensing will undoubtedly enable me to render better care for my community, allow for credentialing within healthcare institutions who are doing the good work, allow me and my colleagues to help fill the provider shortage gap in an overtaxed medical system (especially amid a pandemic), and enable me to grow my practice in Virginia. For each and all of these reasons, I respectfully urge the BHP to recommend licensure of naturopathic doctors.

Thank you again for your time, earnest interest, and diligence in considering this matter thoughtfully. I am glad to help answer any additional questions or to serve as a resource now or in the future.

Sincerely,

*Sarah M Giardenelli*

Sarah Giardenelli, ND, MSOM, LAc

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August 17, 2020

Dear Members of the Committee,

My name is Cecilia Smalls, I am a resident of Maryland. While I have been a resident of Maryland for over 25 years, I have been under the care of a naturopathic doctor who resides in Virginia for over 10 years. I am writing my support for the recommendation of licensure for medically-trained naturopathic doctors for Virginia.

I started my search for a naturopathic doctor that was medically trained about 10 years ago. I found that many naturopathic doctors in Northern Virginia were in better proximity to my residence than many of those in Maryland.

I was looking for a naturopathic doctor who treated the whole body holistically instead of compartmentalizing a specific area without concern as to the cause. I was not interested in simply covering up the symptoms. I am very interested in preventative and maintaining my health as I get older. I appreciate the fact that my naturopathic doctor understands the medical terms of my reports, and I only wish she could order labs for me so I could avoid extra visits to my internist.

I also trust my naturopathic doctor to the point that I have recommended her to other family members and they are patients as well.

It is so important in today's climate that we have licensed naturopathic doctors in Virginia as they can provide support and preventative health care.

Sincerely,

Cecilia Smalls

Fort Washington, Maryland

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August 17, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Vanessa Ferreira, and I have been a naturopathic doctor for over five years. I am writing in support of fully licensing medically-trained naturopathic doctors. Coming from a fully licensed state to practice in an unlicensed state has been a challenge. In Arizona, I practiced for 2 years alongside an obstetrician to provide full-scope gynecological care to patients of the practice. I had the proper training and education to be a part of mainstream medicine and was a valued asset to that medical practice due to my extensive knowledge of alternative medicine which became part of comprehensive treatment plans for our patients. Now that I have come to practice in Virginia, it is difficult having the ability and knowledge to perform physical exams, properly diagnose, manage medications, and provide more mainstream medical care, but not being able to do so. Medical providers and naturopathic providers in a licensed setting work so well together and create advances in patient care with the merging of medical knowledge and experience.

As a doctor, I feel it is important, to both the medical community and the patient community, for medically-trained naturopathic doctors to be able to provide safe, standard of care assessments and treatment options. When I chose to become a naturopathic doctor, I chose it over allopathic medicine because I wanted to be able to provide a new perspective to patient care, but ultimately I valued the ability to work alongside and on par with my medical colleagues on patient care. Having attended a four-year onsite medical program, passing the basic science board exam as well as naturopathic licensing exams covering pathology, pharmacology, nutrition, botanical medicine, I feel that we have the proper training, clinical experience and knowledge to order labs, perform physical exams, manage medications and provide primary care. During this pandemic, there has been a surge in patients looking for preventative medicine and wellness and we, as naturopathic doctors, thrive in that setting.

The intention behind my support to fully license medically-trained naturopathic doctors is to keep Virginia safe through an established standard of care that all doctors, including medically-trained naturopathic doctors, are held to. Naturopathic medicine is a specialty in medicine, and while it may offer different treatment options or more holistic views of health, I strongly believe in having consistent primary care standards across all providers, allowing licensed naturopathic doctors to practice safely under regulation and provide basic, standard patient care. I respectfully urge the Board to recommend licensure.

Sincerely,

Vanessa Ferreira, ND

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On Mon, Aug 17, 2020 at 2:52 PM Al/Darlene Quinlan <almpiano@yahoo.com> wrote:

August 17, 2020

Dear Members of the Committee,

My name is Darlene Quinlan. I have been a Virginia resident for 49 years and I was under the care of a naturopathic doctor for about two and a half years. I appreciated working with this medically-trained naturopathic doctor because of the extended time she was able and willing to spend asking questions and listening to my concerns, and also because I was able to be helped without resorting to pharmaceutical means.

Unfortunately, I was not able to continue to choose a naturopathic doctor. Several factors figured into this, and points 1, 2, and 3 below played a major part in my decision. I am therefore writing to recommend licensure for medically-trained naturopathic doctors.

Here are the concerns I have as they relate to the seven criteria.

**1) Specialized skills.** An aspect that is very important to me is that while many of the healthcare services that naturopathic doctors are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that are not included or emphasized in other practices. NDs are extensively trained in both conventional approaches and natural medicine; thus, they help bridge the gap that exists between conventional and traditional medicine practice. Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions.

**2) Scope of practice.** Currently, medically-trained naturopathic doctors can't offer physical exams, order labs or imaging, or run a basic complete blood count. This was a particular problem and inconvenience for me, especially since I lived an hour away from the doctor. NDs are not allowed by law to give a medical diagnosis for my medical records, and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from the ND. Medically-trained naturopathic doctors are well equipped to provide these basic health care practices, eliminating the need for added appointments. Also, many primary care providers are retiring, and this is increasing the shortage of primary care providers, especially in rural and small town areas -- all the more reason to license already-well-trained naturopathic doctors who can fill this need.

**3) Economic impact.** Licensing medically-trained naturopathic doctors would also pave the road to insurance coverage. Currently, medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. This is a major hardship financially, particularly when it means that I am spending money on health insurance that I cannot fully use!

**4) Alternatives to regulation.** There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient and a consumer, I want access to safe (properly regulated) and holistic (in scope) care that best aligns with my health needs and priorities.

Licensing medically-trained naturopathic doctors will provide a much-wanted, much-needed, and safe additional healthcare access for the people of Virginia. I respectfully urge the Board to recommend licensure for medically-trained naturopathic doctors in Virginia.

Sincerely,

Darlene Quinlan

Green Bay, Virginia

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August 17, 2020

**Dr. Elizabeth Carter:**

elizabeth.carter@dhp.virginia.gov

Re: Health Care Stakeholders Written Public Comment Opposing Licensure for Naturopathic Doctors (NDs)

To the members of the Regulatory Research Committee, the Board, and the staff at the Virginia Department of Health Professions:

The undersigned represent Virginia's physician community. We appreciate the opportunity to submit a written public comment in opposition to the application for licensure of Naturopathic doctors (NDs) in the Commonwealth of Virginia. Virginia has previously issued licenses for NDs and ceased doing so in 1980. In 2005, the Virginia Department of Health Professions once again evaluated this profession for licensure and found criteria was not met.

The undersigned maintain that NDs fail to meet the criteria as defined by DHP to license a health profession, and therefore oppose the regulation and licensure of NDs in Virginia.

#### Addressing the Failure to Meet Criterion One

The application for licensure fails to meet Criterion 1. Sufficient evidence has not been presented that the threat to public health, safety, and welfare would be reduced by regulation and licensure, as the harm results from "(a) practices inherent in the occupation"<sup>1</sup>. The Virginia Department of Health Professions 2005 evaluation of Naturopaths found that, "When considering the actual instance in which individuals had been harmed by persons claiming to be naturopaths, the opinion expressed was that the issue was of unscrupulous, incompetent practitioners that were NOT naturopathic physicians, the group seeking licensure. Thus, regulating naturopathic physicians would not achieve protection from such practices which could not already be provided in Virginia through criminal prosecution for unlicensed practice of medicine, chiropractic, osteopathy, etc."

No information in DHP's 2020 report refutes or negates this finding. Regulation and licensure for NDs would not further protect the public from harm.

Furthermore, there are already codified legal protections for patients against medical bad actors. Any individual who harms another individual by practicing medicine without the proper licensing or qualifications can be prosecuted under current Virginia law, making the regulating and licensure of NDs unnecessary to protect patients<sup>2</sup>. Virginians who are harmed by an ND practicing medicine can currently pursue legal recourse, and licensure of these naturopathic

physicians would not prevent or protect patients who received care from individuals falsely claiming to be NDs.

#### Addressing the Failure to Meet Criterion Two

The medical community maintains that the lack of accountability and transparency in the training and education of NDs has a high potential for risk by nature of the practice of naturopathy, thus failing to meet both Criterion 1 and Criterion 2.

As stated in the DHP report from 2005, NDs have an "insufficient amount of hours providing hands-on care for patients under teaching supervision" and no substantive updates to that training curriculum have been made that contradicts that finding in DHP's 2020 report. The Department of Education does accredit the national naturopathic medical association but "Recognition as an accrediting agency by the DOE does not constitute an endorsement of the educational institution or program." Additionally, the Council on Naturopathic Medical Education (CNME) that is presently accepted as the programmatic accrediting agency has been "in and out of favor with the Department of Education" as of 2018<sup>3</sup>.

In the 2005 study conducted by the Virginia Board of Health Professions, they reported "there has been no independent policy-related research on naturopathy as a system of medicine." The full Board unanimously approved to NOT license and regulate "naturopathic doctors." To date, the educational standards for naturopathic examinations have still not been externally or independently reviewed by any organizations other than naturopathic associations. Other currently licensed health professions such as medical doctors (MDs), doctors of osteopathy (DOs), Pharmacists, and Nurse Practitioners (NPs) have rigorous interdisciplinary review processes to ensure their curriculum and testing meet standards that adequately train them to deliver safe and quality care. This audit of both education standards and clinical practice standards of care are non-existent for NDs.

Furthermore, questions have been raised as to the extent to which the NPLEX (the Naturopathic Licensing Examination) effectively measures competency for Naturopathic doctors. Unlike the NPLEX exam for NDs, the USMLE (U.S. Medical Licensing Exam) has a third section (USMLE Part III) designed to test clinical competence and "assess whether medical graduates can apply medical knowledge... and clinical science essential for the unsupervised practice of medicine." As of a 2018 data collection by the American Medical Association, there is "not sufficient evidence that the NPLEX Part II clinical licensing examinations actually measure clinical competence" for Naturopathic doctors<sup>4</sup>.

The undersigned view the absence of a reliable competency evaluation for entry into the practice of Naturopathy, and the lack of mechanisms to ensure continuing competence, a failure to meet Criterion Two by DHP's definition of specialized education and training.

#### Addressing the Failure to Meet Criterion Four

Criteria four states licensure is only appropriate for "a specific professional whose practices are well defined". As the 2020 DHP report states clearly, "The Scope of ND practice is quite

<sup>1</sup> Board of Health Professions Guidance Document 75-2 Appropriate Criteria in Determining the Need for Regulation of Any Health Care Occupations or Professions

<sup>2</sup> Title 54.1, Professions and Occupations, Subtitle III, Professions and Occupations Regulated by Boards within the Department of Health Professions, Chapter 29, Medicine and Other Healing Arts Article 1, General Provisions, § 54.1-2902. Unlawful to practice without license

<sup>3</sup> U.S. Department of Education. Specialized accrediting agencies. [www.ed.gov/admins/finaid/accred/accreditation\\_pg8.html#med](http://www.ed.gov/admins/finaid/accred/accreditation_pg8.html#med).

<sup>4</sup> Report of the Senate Interim Committee on Naturopathic Medicine, American Medical Association. Prepared by Chris Hogerty, Senate Research Staff. January 20, 2018. <http://www.rfd.state.nm.us/uploads/files/AMAZ%20SOP%20Module%20Naturopath%202018%20FINAL.PDF>

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variable between the 23 licensing jurisdictions” and “Much of the scope of practice of the naturopathic doctor overlaps with other established practitioners”. As listed in the study, counselors, psychologists, dietitians, nutritionists, physical therapists, acupuncturists, and chiropractors are already living and working in the Commonwealth making the regulation and licensing of NDs duplicative.

The design of the health care system relies on care teams to specialize patient care and treatment options in the health care marketplace. With no universally agreed upon definitions of the practice of naturopathy, and no consistent standards of care in practice, the application for licensure fails to meet criteria four.

#### Conclusion

Our health care system relies on proven, tested, and scientifically rigorous training and education, and Virginia’s patients rely on the leadership of agencies like the Virginia Department of Health Professions to evaluate these criteria to distinguish medical validity. We would like to thank the DHP staff for their meticulous research and thorough study, and for the opportunity to provide feedback on behalf of the physicians, PAs, medical students, and patients in Virginia to the members of the committee and the Board for consideration. The Medical Society and the undersigned specialty societies are fully opposed to licensure of Naturopathic doctors and maintain that NDs fail to meet the criterion as set by DHP.

To discuss this matter or written comment further, please contact Clark Barrineau at [cbarrineau@msv.org](mailto:cbarrineau@msv.org).

Sincerely,

American Academy of Pediatrics – Virginia Chapter  
American College of Obstetricians and Gynecologists – Virginia Chapter  
American College of Radiology – Virginia Chapter  
Medical Society of Virginia  
Virginia Academy of Family Physicians  
Virginia College of Emergency Physicians  
Virginia Orthopaedic Society  
Virginia Society of Anesthesiologists  
Virginia Society of Eye Physicians and Surgeons

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On Tue, Aug 18, 2020 at 9:24 AM Kelsey Wilkinson <[kwilkinson@msv.org](mailto:kwilkinson@msv.org)> wrote:

Hello Elaine and Dr. Carter,

I hope this email finds you well. Thank you for your continued work on the new Naturopaths study, as well as the catalog of other important issues facing Virginia’s Health Professions.

I wanted to follow-up with some source materials to answer questions that came up a number of times from the members of the Regulatory Research Committee during the public comment period on August 11th, specifically about the education review process for Naturopathic training programs and accreditation of the education. I wanted to share this resource from the American Medical Association (AMA) who did a Scope of Practice analysis of Naturopaths and national regulatory comparative review.

The MSV has provided brief reference to this information submitted to Dr. Carter in a separate email per the instructions for Written Public Comment.

I share at the discretion of you and the staff to share with the committee as you see fit given the extensive research you and your team have already done, but wanted the research to be available given the questions posed on Tuesday.

Thank you all again!

**Kelsey Wilkinson**  
Government Affairs Manager  
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Mon, Aug 17, 2020 at 3:09 PM Kelly Morris <[kellysmorris@hotmail.com](mailto:kellysmorris@hotmail.com)> wrote:  
August 17, 2020

Dear Members of the Committee,

My name is Kelly Morris, I have been a Virginia resident for 22 years. I am writing in support of full licensure for medically-trained naturopathic doctors.

My daughter, Cassidy Morris, is currently a naturopathic medical student in her 3<sup>rd</sup> year at the National University of Natural Medicine, an accredited naturopathic medical school. The time and dedication that she has devoted over the years has established a strong foundation that she continues to build on through the graduate-level naturopathic doctor program. Knowing the rigorous and demanding education and training my daughter has chosen as a career and the happiness it brings her, it is my hope that the titling and credentials of being a Naturopathic Doctor after her name be as meaningful in Virginia as they are in licensed states if she were to move back home. By recognizing the commitment to attaining a naturopathic doctor education further supports the ability for my daughter to repay her student loans, which is a significant known burden of the medical profession debt.

As a parent of a naturopathic medical student who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the seven criteria.

1. **Risk of harm.** There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school or received a rigorous graduate-level education. The public generally does not know the difference between these two types of providers. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia. Additionally, adding Virginia to the list of states, which includes the District of Columbia and Maryland, that regulate naturopathic doctors.
2. **Scope of practice.** Currently, medically-trained naturopathic doctors cannot offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services – including prescriptions, such as basic antibiotics and anti-hypertensives. Medically-trained naturopathic doctors can order labs in all 25 jurisdictions that regulate them, they are able to prescribe

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medications in 13 states, are recognized as primary care providers in 12 states, and are credentialed by health insurance companies in 6 states.

3. **Economic impact.** Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it’s burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Kelly Morris

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August 16, 2020

Members of the Board:

My name is Theresa Collier. I am a naturopathic doctor and a long-term resident of Virginia. I obtained my naturopathic doctor training at Bastyr University in 2002 at which point I moved back to my home state of Virginia. I was the founder and first President of the Virginia Association of Naturopathic Physicians (VAANP). We have gone from less than 10-12 naturopathic doctors in 2005 to over 40 in the state. We have added residency training within the Commonwealth and it is at times hard to believe that we are still working towards licensure in Virginia.

Our doctors work hard and have provided quality of care for years. Over the 18 years since I returned to Virginia after naturopathic school our other medical colleagues have understood the value that we provide to the current system, but we hope that the State of Virginia will also finally recognize the skills and support we bring to our community. We are willing to serve and have training in various landscapes including urban and rural settings. Licensing naturopathic doctors is ethical and provides additional access to care. It is vital to have oversight as does every other profession within medicine. Even outside of medicine, beauticians and even barber shops, not only have business licenses but must have a license to provide services. The time for licensure of naturopathic physicians is far past due. We can do better for our patients and the Commonwealth as a whole.

I would like the opportunity to speak more directly to the seven criteria put forth by the Department of Health Professions:

1) Harm/risk of harm- There are individuals that use the title of naturopathic doctor who did not go to medical school. This is confusing to the public. Some include lay healers or health coaches and unfortunately this coursework is not even recognized by the Department of Education. This confusion impacts consumers/patients and also other providers wishing to refer their patients to naturopathic doctors. There should be distinction between the two. Additionally, in every form of medicine there is oversight. The same should be within naturopathic medicine. This can lead to risk of harm without appropriate professional oversight.

2) Specialized skills- I often receive challenging cases where patients have failed various therapies. They have been to their PCP and also specialists where there is little left to offer. The reason that myself and other naturopathic doctors are referred challenging cases is due to our specialty skills in prevention and also repair of health. We also have a variety of therapies to offer outside of drug therapy. We are trained in drug therapy but try to use various therapies if appropriate. We not only have competency in drug therapy but also herbal medicine, physical medicine, nutrition and homeopathy. We have lots to offer patients outside of pharmacological agents. We also have the ability to look at the patient as a whole person -thus we specialize in whole system or whole person care. We realize that illness is not just on the physical level it also exists on the emotional, mental and spiritual level. Leaving this out is why many patients fail modern medical therapies.

3) Autonomous practice- There is no state or province that provides supervision of naturopathic doctors. They are a distinct medical provider and are doctors where supervision by other doctors or physicians would be impractical and not congruent with O\*Net provider specifications and professions.

4) Scope of practice- Naturopathic doctors are trained as primary care providers. We have the ability to provide the needed resources and therapies for the most common concerns or illnesses. But

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functioning without a license in Virginia prevents us from providing physical exams, running laboratory testing or imaging and even prescribing necessary drug therapy for patients. Our goal is to use the least invasive therapies but if a patient needs a pharmaceutical, it is unethical to not provide this for the patient. Common drugs such as antihypertensives, antibiotics and even drugs such as metformin or insulin are imperative to have access to as a primary care provider. In various states throughout the US, each state must carve out the scope most relevant for their citizens. With the lack of primary care providers, it makes ethical sense to include pharmacotherapy into a formulary for naturopathic doctors. The same applies to minor surgery and IV therapy. We are trying to provide the best therapy for our patients.

5) Economics- Due to the fact that we see patients with complicated illnesses at times there can be a lag of time for patients to get their labs run. We have to contact the physician or the patient has to contact the doctor. This is inefficient and a waste of resources. Additionally, we often keep people out of the hospital and keep them well which saves insurance companies financial resources. Patients will often have to pay for two appointments in order to get laboratory testing or imaging run. It makes the entire system less efficient which also wastes financial resources.

6) Alternatives- No alternatives currently exist to licensure that provide adequate transparency and safety to the consumer. Consumer agencies such as the BBB are housed more in commerce versus patient care and safety. They know little about medical ethics and have no medical training or oversight. They can't prevent future harm of patients either. Again, it seems confusing that licenses can be provided for many service industries but not for naturopathic doctors. This is incongruent but we are at a place where we can make it right and more congruent across various services and disciplines of medicine throughout the Commonwealth. Licensure provides that congruence.

7) Least restrictive- There is no other option that provides safety and occupational standards outside of licensure for naturopathic doctors.

At this time, I ask that the Board vote in favor of recommending naturopathic licensure due to us fulfilling all 7 criteria laid out by the Department of Health Professions. Thank you for your consideration.

Sincerely,

Theresa Collier, ND

Theresa Collier, ND

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August 15, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors. My name is Barbara Petty and I have been practicing medicine as a nurse practitioner for over 25 years. I am Board Certified as a Family Nurse Practitioner (FNP-C) and as a Women's Health Nurse Practitioner (WHNP-BC). Throughout my years of practice, I have worked collaboratively with medically-trained naturopathic doctors and have them to be extremely competent and to provide care that is not only safe but also effective, especially in the areas of prevention and health restoration.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven safety criteria used by the Board, as they relate to licensing naturopathic doctors:

**Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath. Licensure of medically-trained naturopathic doctors and a regulatory framework, will provide clarity while also promoting safety and access to patient-selected care. At present, lay naturopaths are also able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically-trained naturopathic doctors, who have received doctoral degrees from federally recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically-trained professionals pose some degree of risk of harm, and should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals, and it is accountability that medically-trained naturopathic doctors are seeking for their healthcare field.

**Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally specialized type of training: skills they acquire are unique compared to lay naturopaths and other medical providers. As you are most likely already aware, naturopathic doctors complete a four-year onsite medical program and complete board exams in basic sciences. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine.

The recent COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention. Medically-trained naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

**Autonomous practice.** Medically-trained naturopathic doctors practice independently in twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.

**Scope of practice.** Medically-trained naturopathic doctors are trained as primary care providers and their scope of practice should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained

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naturopathic doctors are trained to provide. Medically-trained naturopathic doctors can serve as additional providers to help our society deal with the many medical crises now prevalent in the United States be it chronic pain, addiction, chronic disease and mental health. Medically-trained naturopathic doctors work collaboratively within the health care system to serve as another safety net provider. With the current pandemic, resources are even more limited and trained medical professionals are critical to our public health system.

**Economic impact.** Licensure will increase the number of medically-trained naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. Currently, the closest localities that license medically-trained naturopathic doctors include Maryland and the District of Columbia. Medically-trained naturopathic doctors wishing to practice more fully to the scope of their training and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions.

Additionally, licensure is the first step towards some level of insurance coverage for patients. Presently, medically-trained naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need of care but lacking access to that care -- are unable to receive the preventative medical services that naturopathic doctors are so well positioned to be able to provide.

**Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors do not currently have adequate redress. At this time, the best they can do is to contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse because there is no ability to suspend or revoke licensing or credentials and have that information available to the public.

**Least restrictive regulation.** Licensure is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license medically-trained naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors --titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process does not currently distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

I respectfully urge the Board to recommend licensure of medically-trained naturopathic doctors because this will provide additional and safe health care access for the Commonwealth.

Sincerely,

Barbara E Petty, MSN, WHNP-BC, FNP-C

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August 16, 2020

Dear Members of the Committee:

First of all, I would like to express my gratitude to Dr. Elizabeth Carter and her staff for the preliminary report that has been presented, related to licensure of naturopathic doctors in the Commonwealth. It is apparent that great time was spent to provide as thorough a report as possible. Thank you for your efforts.

My name is Leah Hollon. I am a naturopathic doctor who lives and works in Richmond, Virginia. I graduated with my MPH in 2003 from the VCU School of Medicine. My work in prevention and public health naturally led me to naturopathic medicine, where I completed my ND degree in 2008, and completed a one-year residency in primary care in 2009. I have worked in a multitude of clinical settings including Federally qualified healthcare centers (FQHCs) drug courts, and community clinics. Upon completing my naturopathic medical education and training, I returned to Virginia, and began working in Southwest – instructing at the Appalachian College of Pharmacy (ACP) within academic coursework and public health rotations. At the time Buchanan County, where the college is housed, had the third worst health statistics in the United States due to smoking, hypertension, diabetes, unintentional injuries, obesity, cancer, and opioid addiction. Due to these healthcare realities and challenges, I have had the opportunity to partner with various individuals and organizations including RAM, Health Wagon, drug court, VDH, community service boards, C-Health, and faith-based communities.

During my time in Appalachia, I served as a core team member in establishing the Buchanan County drug court alongside social workers, law enforcement, and the Honorable Judge Johnson. I also served as the onsite coordinator and assisted in the implementation of the first PharmD residency site at the college. My role also included teaching physical exams to pharmacy students and assisting in their clinical skills related to laboratory testing and interpretation. I have also conducted research in integrative medicine within Appalachia. Throughout all of these experiences, I feel grateful to have worked with a variety of health providers over the last twenty years, including medical researchers, MDs, DOs, PharmDs, PhDs, PTs, NPs, PAs, law enforcement, and counselors. This is what provides the best care for patients and our communities.

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was concerned. In researching this specific lay naturopath, there were no complaints or cases reported to the BBB. But another lay naturopath that this patient had considered seeing was Charmaine Bassett, who had caused grievous harm that led to the death of a male patient. I was grateful that my former patient had not chosen Charmaine, but there was still concern due to inappropriate assessment and care for my patient with a different lay provider. There is nothing at this time in Ohio or in Virginia that provides additional protection to the consumer. This example demonstrates the potential harm that can be done without appropriate regulatory oversight to protect the public. We can decrease potential harm through licensure and provide distinction between lay providers and naturopathic doctors.

- **Potential for harm/risk of harm without access to PMP (Prescription monitoring program):** By not being licensed providers within Virginia, naturopathic doctors lack critical access to PMP. We must rely solely on the provided history of the patient. This is a concern due to possible interactions and duplications, as well as serving to reduce opioid addiction within the Commonwealth. We are functioning with partial knowledge. Without this there is risk of harm to the patient and the community at large.
- **Professional accountability of naturopathic doctors:** With any licensed medical discipline, if there is a physical or mental illness that is impairing the judgement or care being provided, there are ways to report concerns to an appropriate Board for oversight. At this time, if there is a naturopathic doctor that is unwell due to physical illness, addiction, or even mental illness, there is nothing that keeps that naturopathic doctor from still seeing patients. Additionally, if there are ethical violations, there is no recourse or professional standards to keep naturopathic doctors from potentially causing harm again. They can continue seeing patients without appropriate care and support for themselves. This puts both patients and the naturopathic doctor at risk for harm.
- **Delay in needed care:** Without licensure, naturopathic doctors are currently unable to provide physical exams and laboratory testing. This is a true ethical dilemma, especially at critical times with possible illnesses such as infections or cases of abdominal pain (including suspected appendicitis). Not having a scope that includes pharmacotherapy puts the patient at further risk and is negligence, if essential medications are urgently needed. Not being able to perform pertinent exams is also an ethical issue, due to the fact that ruling in or ruling out a condition could put the patient at greater risk by not having appropriate testing or exams that would allow an ND to diagnose and treat appropriately. Additionally, patients that see us for more chronic disease often have to wait for days or weeks for appropriate testing to connect with their other providers. Many conventional medical providers are not trained in preventative medicine, and thus may not understand our request for specific lab testing. Thus, the delay in care and assessment also puts the patient at risk. And the risk is even greater for those that have failed multiple therapies because they are typically more physically unstable.
- **Briefings and public health:** Since NDs do not currently have a practice license in Virginia, we are not viewed as part of the health care system as we are in other states. This means that we are not systematically or routinely included in as medical professionals in urgent updates within the state, including pandemics, addiction, or provided resources. Our own Association does its best to stay apprised of local and state issues – but without being privy to this critical

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In 2012, after my husband's military deployment overseas, we returned to the state and settled in Richmond. We opened a naturopathic office, and since then we have provided 20,000 hours of direct patient care. We also served as the first naturopathic residency site in the Commonwealth for naturopathic doctors, where I continue to serve as the onsite clinical supervisor. The work here (within a more urban setting, instead of in rural Appalachia) still requires ongoing collaboration and referrals to make sure that our patients are taken care of with the best support possible. We also receive many referrals from other medical providers, when they have challenging and/or non-responsive cases. The background I have just provided hopefully helps the Board to see the various roles in which naturopathic doctors can serve, and our goal of collaboration and enhancing the health and well-being of our patients and our communities.

Below are direct, personal comments related to the criteria presented by the Board of Health Professions, and how they pertain to licensure of naturopathic doctors (NDs) in Virginia.

#### Risk of harm

- **Distinction of lay providers versus naturopathic doctors:** At the completion of my naturopathic degree, I had completed 4,816 hours of training and 1,600 hours of direct supervised rotational hours. Another 504 hours was comprised of external rotations. Currently however, there are individuals that refer to themselves as "naturopathic doctors" who, in most cases, are lay providers or lay naturopaths that did not attend formal medical naturopathic doctor training. Their training is not accredited by a federally-recognized governing body. Many of these lay programs are for-profit schools offering certificate online instruction without clinical training. For public transparency and adequate choice, the public and other medical providers need to have clearly-discernable information to distinguish between the two groups for appropriate referrals. Just within the last six months, there are two situations where lay providers have caused harm due to this lack of medical training.
  - Four weeks ago, I received word from PharmD colleague that a "naturopath" had self-diagnosed herself with breast cancer and applied a topical black salve on her breast tissue. The breast tissue had secondary chemical burns with exudate. The lay naturopath shared that she should drink the exudate in order to be healed. She had refused to have appropriate work-up with an oncologist, dermatologist, or mental health provider. This case took place in Tennessee and a pharmacy intern brought this to attention (this intern also has rotations in Virginia and Tennessee). This is a grave concern. The lay naturopath was not getting the care required and she caused harm to herself due to a lack of proper training and education. Additionally, she was sharing with others (under the banner of naturopathic medicine) about the harmful therapies she was utilizing to "heal" herself. This is harm.
  - I saw a patient for approximately 9 months for fertility concerns, before she moved to Ohio. Once settled in Ohio she sought out a "naturopathic doctor". The "naturopathic doctor" was actually a lay naturopath, but the patient thought she was a medically trained naturopathic doctor. Under the care of this lay naturopath, the patient began having relentless diarrhea, abdominal pain, lethargy, and was told she had parasites. The patient reached out to me due to her side effects because she

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information, it puts patients, public health, and providers at risk. Often times our medical updates are coming from provinces that are outside of Virginia, and thus it is not geographically specific to our patients and our communities.

- **Risk during a pandemic:** The current pandemic has further widened the access to care gap. Our nation was already lacking inadequate numbers of primary care providers (including Virginia). With COVID-19, many physicians are leaving medicine because they have been pushed to their limits. Some patients have been turned away due to capacity or lack of resources, whereas other practices are closed. This has led to relatively simple illnesses deteriorating into serious disease. Critical referrals for mental health are taking 7 weeks and up to 4 months. Many patients are being displaced, and their needs are not being met; not because medical practitioners are not trying, but because the system is overwhelmed. Without a license, naturopathic doctors are unable to even order testing for COVID. This is harm not just to the patient, but the public at large; it is a public health concern.

#### Specialized skills and training

- **Prevention:** Naturopathic doctors share a core value of *prevention*. This means it is the foundation of our clinical education. We have been taught to look at the deep underlying biochemistry and pathology contributing to the person's health, where we work to prevent further disease and enhance or promote restoration. This can include social aspects, education, environmental, nutrition, and epigenetic contributors.
- **Holism:** Naturopathic doctors are trained to look at the entire picture versus just one symptom or concern. Accessing the patient's health through physical, emotional, and spiritual aspects is key to their healing and restoration. Our training encompasses this from therapies such as botanical medicine, pharmacy, homeopathy, and physical medicine.
- **Complex diseases:** We often see patients that have failed multiple therapies (including surgery and pharmacotherapy). Many patients are referred to us by their providers, due to our depth of training and restoration of health and well-being. We see many cases of those with autoimmune disease or other chronic health illnesses, where their conventional physicians have exhausted resources and are unable to offer them anything further to help. Thus, we frequently specialize in seeing those with rare illness or complex diseases.
- **Complexity of therapy options:** Some patients do not respond to typical therapies, such as pharmacological agents, but they may need and respond well to botanical medicine or dietary changes. Naturopathic doctors are trained in many therapies, including drug therapy, botanical medicine, physical medicine, homeopathy, and nutrition. Together we are trained to interweave and create the most appropriate plan for the patient in front of us, that may or may not encompass all of these therapies. We must know the interactions and side effects. There are few other providers at this time who are trained to this level of understanding related to the interconnectedness of various therapies including precautions, side effects, and contraindications.

#### Autonomous practice-

- **Other states/provinces:** Naturopathic doctors work autonomously in all other jurisdictions where they are licensed.

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- **Oversight by other medical practitioners:** Many other medical providers are competent in their own specific scope of training, but they are not trained in naturopathic medicine (nutrition, botanical medicine, physical medicine, homeopathy, in combination with drug therapy). We often receive referrals due to our specialty skills. Thus, having oversight or supervision by a different medical discipline is inefficient and not practical or useful. For both providers it increases workload, with little justification and verifiable outcomes.
- **Issues with oversight by other providers:** Many malpractice and liability insurance providers are less likely to provide coverage of a supervising provider or discipline, if that medical provider is not trained in that specific discipline.
- **Inefficiency:** Oversight by a medical doctor for another medically trained doctor is ultimately inefficient, both for the providers and also for patients.

#### Scope of Practice

- **Shared therapies:** Within medicine, there are many professions that overlap in terms of utilized modalities, including MDs, DOs, PharmDs, PAs, and NPs. They all share some form of prescribing rights throughout the United States. They all take some form of licensing exams to establish competency. They each complete ongoing CME. Likewise, naturopathic doctors share similar skills of physical exams, laboratory testing, ordering imaging, and prescribing.
- **Scope variances in localities:** Each state or province must determine the needs of their citizens. Respective legislative bodies determine what is appropriate from state to state. This should not be confusing; the same mechanism exists for NPs and even PharmDs. In some states, PharmDs can complete physical exams and also have prescribing rights. Each state sets the scope which provides the differences seen between states.
- **Scope of naturopathic doctors:** For myself, I was trained in primary care due to completing my education in Oregon, and also completing a residency in primary care. With this I can speak directly to my training and education. We are trained in physical exams, laboratory testing and interpretation, order of imaging and interpretation, physical medicine, clinical nutrition, botanical medicine, physical medicine, homeopathy, and pharmacology. The most invasive therapies we learn include IV therapy and minor surgery. Our goal is to use the least invasive therapies first if appropriate. Sometimes, that is not possible. If someone has a laceration, minor surgery is necessary. Likewise, someone may be suffering from dehydration due to rare illnesses such as POTS, and IV fluids are warranted. Within primary care, we use the most appropriate therapy warranted to help the patient.

#### Economic impact

- **Same cost to consumers:** Licensing naturopathic doctors will not keep lay providers from seeing consumers, or prohibit public choice in providers. Lay naturopaths will be able to keep their doors open, and will be able to continue selling and counseling on their products or supplements. It will not prevent grocery stores, health establishments, and/or pharmacies from selling supplements or vitamins. One important aspect of licensure is to provide transparency about the differences between lay naturopaths and naturopathic doctors. Consumers will have a clear choice of the provider they wish to see. Licensure will not thwart their access or drive up costs.

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was established more for complaints of service or purchase, versus harm to a patient or upholding ethical standards in medicine. It is housed more in commerce, versus preventing physical harm from occurring again. It does not keep a naturopathic doctor or lay naturopath from still seeing patients if harm has occurred in the past. They have no governance over patient safety now or for future cases of harm.


- **Strengthening consumer protection laws:** Putting in additional protection laws requires legislative authority through the General Assembly, which can be challenging. Such laws of protection might be crafted but it still would not offer the same robust oversight for patient safety or potential harm as regulating the profession would.
- **Defined scope of practice:** Critically, no other alternatives to regulation would provide a defined scope of practice for medically-trained NDs. Licensure is the necessary mechanism.

#### Least restrictive-

- **O\*Net Job Zone Five-** Every medical doctor profession within this category has licensure except naturopathic doctors. This includes pharmacists, gynecologists, dentists, neurologists, and pediatricians. Licensure of naturopathic doctors provides the least restrictive option for appropriate oversight, consumer protection, and an appropriate and defined scope of practice.

Thank you for your time and consideration. If I can be of additional support or provide additional information, please know that I am available and welcome your questions. I ask that the Board vote in favor of a recommendation for licensure of naturopathic doctors in the Commonwealth of Virginia.

Sincerely,



Leah Hollon, ND, MPH

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- **Coding and billing for patients:** Without licensure of naturopathic doctors, patient visits are unable to be coded. This means that many patients are unable to even file a superbill on their own for partial or full insurance coverage. Licensure would allow naturopathic doctors to code services that allow patients to submit to third party payers. Licensure could reduce out-of-pocket expenses for consumers through third party payers.
- **Duplicate appointments:** There are instances where laboratory testing or imaging is warranted. Without licensure, naturopathic doctors are unable to order these and must then coordinate with the patient's PCP or specialist. This means that the patient must make another, separate appointment and pay additional out of pocket expenses before receiving the necessary healthcare service.
- **Malpractice concerns:** Because the state of Virginia does not license naturopathic doctors, it is very challenging to obtain malpractice coverage. There are only a few companies that will cover naturopathic doctors in an unlicensed state. Due to the lack of malpractice companies willing to cover naturopathic doctors in unlicensed states, premiums and cost are often extremely high due to a lack of competition. Higher economic burden is placed on the naturopathic doctor attempting to protect patients and themselves in case of harm. This is an ethical and professional responsibility of all medical providers; however, legal counsel has shared with us that because of the lack of licensure, these policies may be useless due to gray areas that exist. It is important to carry malpractice for all medical providers but there is a good possibility that these policies currently may not hold water in an unlicensed state (including Virginia). This means that patients and the naturopathic doctor may be at risk.
- **Employment within medical establishments, academia, and institutions:** Many institutions are unable to hire naturopathic doctors, because if the state of Virginia does not license naturopathic doctors, then the institution policies, liability insurance, and also malpractice does not cover them or there are gray areas. This decreases occupational and employment opportunities for naturopathic doctors and naturopathic doctor residents alike. It decreases access to care for patients that need naturopathic services. Naturopathic doctors graduate with the similar loan debt as MDs and DOs. It can be challenging to pay off \$200,000 of loans as a single naturopathic office. Providing licensure could provide additional employment opportunities and decrease the financial burden on naturopathic doctors. It may also offer employers the opportunity to bolster prevention services within their institutions; this has the ability to be cost-saving.
- **Financial contribution from our office:** Since returning home to Richmond, our office has provided over 20,000 hours in eight years, employs five medically-trained naturopathic doctors, and we will be adding two residents to our staff in Fall 2020 for this residency cycle. We have 10 FTE positions, and contributed approximately \$300,000 in revenue to the Commonwealth over our years in operation.

#### Alternatives to regulation-

- **Current consumer options:** Entities such as the BBB have no authoritative training in medicine. They have never served as oversight to medicine or ethical aspects of medicine, including appropriate standards of care. While the BBB may register complaints related to naturopathic medicine, a complaint doesn't help keep future harm from occurring. The BBB

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On Mon, Aug 17, 2020 at 3:26 PM Mary Mielke <mary.mielke@bastyr.edu> wrote:  
August 17, 2020

Dear Members of the Committee,

Thank you for your work and review of the proposed regulation of naturopathic doctors in the Commonwealth of Virginia. My name is Mary Mielke, and I am licensed as a naturopathic physician in the District of Columbia. As a citizen and a naturopathic doctor, I support full licensure of medically-trained naturopathic doctors in the Commonwealth of Virginia. I believe that Virginians deserve greater access to important health and medical services, especially primary care.

Safety is of paramount importance to the Commonwealth and consumers. Medical professionals should be regulated and accountable in their practice to ensure that safety. The following comments address the standards the committee uses in considering professional regulation:

- 1) **Risk of harm.** There is a degree of risk in the practice of medicine and therefore licensing and oversight of most practitioners. Most consumers do not know the difference between a medically-trained naturopathic doctor and a traditional or lay naturopath. Medically-trained naturopathic doctors have attended a 4-year post-graduate medical education recognized by the US Department of Education and accredited by conventional education accrediting bodies. By contrast, there are online programs promoting "Doctoral Degrees" and "Board Certification" for traditional naturopaths and advising in which states individuals can safely market those terms when advertising to the public, and Virginia is on that list. Licensing of naturopathic doctors delineates the difference between medically-trained naturopathic doctors and lay practitioners and would take Virginia off that list of vulnerability.
- 2) **Specialized skill and training.** 4-year, accredited naturopathic medical schools train students who have met the same pre-requisite education as conventional medical students. The education includes conventional diagnosis and treatment and prepares doctors as primary-care providers. What sets naturopathic doctors apart from conventional doctors is learning how to safely prescribe nutrition, botanical medicine, and other supplementation and how to avoid harmful interactions. We are trained to monitor chronic conditions and when to refer to advanced specialties. We are trained to work as part of a complete medical system, and provide specialized knowledge within that framework.
- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with other medical professionals.
- 4) **Scope of practice.** To improve access to primary care, naturopathic doctors should be licensed to their full scope of training. This includes scope of practice to conduct physical examinations, order medical tests, and prescribe necessary medications for acute and chronic conditions.

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5) **Least restrictive regulation.** I believe that licensing is the only path that provides adequate oversight and mitigation of risk to the public. Certification and registration continue to leave it up to the public and consumers themselves to evaluate credentials.

I respectfully urge the Board to recommend licensure.

Sincerely,

*Mary Mielke*

Mary Mielke, ND IFMCP LMT  
Naturopathic Doctor  
Institute for Functional Medicine Certified Practitioner  
Licensed Massage Therapist

On Mon, Aug 17, 2020 at 3:38 PM Cristin Traylor <cktraylor@gmail.com> wrote:  
Dear Members of the Committee,

I have been a Virginia resident for over 20 years and have been under the care of a naturopathic doctor for approximately 30 years (previously in CT). I am writing in support of licensure for medically-trained naturopathic doctors.

As a patient of a naturopathic doctor, I have the benefit of someone who attends to me as a whole person, and who wants to work in conjunction with my medical team. My naturopathic doctor never contradicts my medical doctors. Instead, she obtains the full diagnoses from my medical doctors so we can thoroughly discuss the complementary treatment options. Unfortunately, none of these treatments or visits are covered by insurance because NDs are not recognized by the Commonwealth. Licensure in Virginia would be a step towards obtaining insurance coverage. Naturopathic medicine should be available to anyone - not just those that can afford it. There are a lot of complementary treatments that can really help with various illnesses. We should join the 22 other states that license or regulate naturopathic doctors. Frankly, we are a bit behind the times here in Virginia, but now is the time to bring us into the 2020s by forward-thinking on the overall health and wellness of our population. Naturopathic medicine should be a regulated industry so that patients do not unknowingly end up under the care of a traditional naturopath with no medical training. Regulation would also bring the NDs under the purview of a regulatory board, which is important for public health and safety. There are no alternatives to regulation that will ensure patients have access to safe and holistic care by naturopathic doctors.

I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Cristin Traylor  
Henrico, VA 23229

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On Mon, Aug 17, 2020 at 3:48 PM Christopher Loschiavo <closchiavo@mymail.vcu.edu> wrote:  
August 17, 2020

Dear Members of the Committee,

I am personally writing in support of licensing of naturopathic doctors in the state of Virginia. My name is Dr. Christopher A. Loschiavo, and I'm currently on my fourth year of Oral and Maxillofacial Surgery residency. I moved to Virginia from Arizona where Naturopathic medicine is fully licensed and strongly integrated in the medical treatment of those with a multitude of ailments. During my time as a doctor I've had the opportunity to collaborate with Naturopathic Doctors and witness the positive, transformative potential they offer in regards to patient care. Each collaboration in Arizona has been a positive one where I've been able to appreciate the highest degree of competence in providing patient care, determining the requirement for specific diagnostic exams, and identifying cases best treated with referral. Naturopathic doctors are specifically trained in preventative work aimed at restoring health. This has been made apparent to myself through the different perspectives with specialized approaches to patient care that I have witnessed. Treating medically complex patients with a multifactorial, alternative approach in collaboration with allopathic doctors has yielded overall better outcomes for all of my patients who prefer a naturopathic approach to their health.

I originally was not aware of the rigorous training medically-trained Naturopathic doctors receive. I've learned through multiple consultations and collaborations that medically trained Naturopathic doctors receive training equal to that allopathic doctors receive, with the addition of alternative and distinctly unique approaches to care. Not only do they receive the basic sciences training all doctors do, but also complete licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. I've personally collaborated with medically trained Naturopathic doctors in Arizona specializing in men's health, endocrinology, obstetrics and gynecology, cardiology and hepatology in the form of preoperative consultation and risk stratification. All have displayed the highest degree of competence. Through my experiences in a fully licensed state (Arizona), I have developed a strong appreciation for medically trained Naturopathic Doctors and the unique skill set they offer to our patients as standalone providers or those working alongside allopathic doctors.

It is with my full conviction that I support the full licensing of medically trained Naturopathic Doctors in Virginia for the betterment of patient care and overall outcomes in our battle against disease and ailment in our society, especially during these pressing times.

Thank you,

Christopher A. Loschiavo, DMD

August 17, 2020

Dear Esteemed Members of the Board of Health Professions:

This is a letter of passionate support and 100% recommendation for licensure for medically-trained naturopathic doctors.

In the 11<sup>th</sup> hour I have been made aware the Board of Health Professions is studying the "need" to license naturopathic doctors (NDs) in the blessed Commonwealth. My name is Andrea SpringerCollins and I have been a Virginian for 16 years. I have had the 'privilege' of personal involvement with a naturopathic doctor for the last four years. Would definitely not call what I have experienced 'care' because the individual is not considered 'a licensed doctor' although medical school was completed which makes absolutely no sense. I humbly urge the Board to immediately recommend licensure for medically-trained naturopathic doctors!

Please consider the suffix NMDs instead of NDs so people are *not* confused and clear their naturopathic doctor completed medical school! Why sell the licensed naturopathic doctor short in the absence of a proper suffix?

One reason for support- Licensing provides safe access to care by a medically-trained doctor of naturopathy. Like a back alley abortion, odds are a person risks harm when they may think they are receiving services from what appears to be credible, legitimate, safe, consultative advisement from a 'traditional naturopath' with no medical training instead of from an individual accountable to a regulatory board with authority to restrict a practice license. How much sense does that make?

Like a back alley abortion, odds are a person risks harm when they may think they may be receiving services from what appears to be a credible, consultative advisement from a 'traditional naturopath' with no medical training instead of a regulatory board with authority to restrict a practice license. How much sense does that make?

Second reason- Naturopathic doctors are medical providers trained specifically to consider patient health *holistically*. Trained in drug-herb, drug-nutrient interactions. NDs or NMDs can help bridge the gap that exists between convention, out-dated, traditional medicine practice. NMDs expand access for care particularly in light of the ever-increasing shortage of primary care providers.

**Fact:** Integrating daily practices and different approaches has contributed greatly to my own overall health, wellness, self-care and general well-being which has improved markedly over time attributed to my engagement with a naturopathic doctor.

I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia. Failure to do so in these times could be considered a violation of the Hippocratic Oath.

Sincerely yours,

Andrea SpringerCollins  
Non-clinical worker in the healthcare industry

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## **Benedict Lust**

The term "Naturopathy" was first coined in 1885 by Dr. John Scheel, a German homeopath practicing the methods of Kneipp and Kuhn at his Badekur Sanitarium in New York. Benedict Lust purchased the name in 1901 to describe the eclectic practice of "nature doctors". The Kneipp convention held in New York in 1901 marks the birth of naturopathy in America. At that time, Naturopathy embraced all known means of natural therapeutics, including diet, herbs, hydrotherapy, homeopathy, exercise, manipulative therapies, electrotherapy, psychological and spiritual counselling. Louisa Lust, a naturopath and the wife of Benedict Lust, provided much financial backing for the naturopathic profession in its early years. Dr. Henry Lindlahr and other significant naturopaths influenced the profession in the early years.

## **Naturopathy**

Naturopathy is defined as a scientific system of Natural Healing by the Naturopathic Doctor to diagnose, treat, prescribe, for any human health imbalance by use of natural methods or modalities such as food, herbs, natures remedies to restore the body to its natural normal state without the use of drugs, serums, injections, conconotions, major surgery. Naturopathy was defined by congress in 1931 (see attached). Naturopathic Medicine has not been defined. Dr Lust stood by these principals and was adamant about maintaining these standards to create distinction and exclusion of any and all allopathic practices. Originally, Dr Lust was pro legislative practices but urged standardization first. There was much debate over the standardization to include allopathic practices. Dr Lust was fundamentally opposed to such inclusion of allopathy inside of Naturopathic Practice. Hence, why he was opposed to the practice of Naturopathic Medicine and stood by the practice of Naturopathy.

It is understood that in Naturopathy the belief is that the body develops disease as a result of accumulation of toxicity based on unhealthy lifestyle habits, poor diet, improper care of the body, mental, and emotional abuses to the body as well as environmental exposures. The body is always in a state of healing and can and will heal itself if given the right environment. It is determined that acute disease such as fevers, cold, inflammation, etc is determined as the body's way to self initiate the healing process. Chronic disease is the continued suppression and the result of continued poor health. In Naturopathy, it is understood the body has a natural ability to heal itself but the person must take ultimate personal responsibility in doing so and contribute to the healing process. Thus the Naturopathic Doctor becomes a coach, a teacher, and a mentor in self healing for the individual.

Naturopathy is a non-medical healing art. It does not make use of drugs or operative surgery. It uses simple natural agencies such as air, sunshine, water, diet, heat, light, manipulation, mental,

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completed standardized education of diadetic training. Traditional Naturopaths are another category of Naturopath. Traditional Naturopaths have varying educational backgrounds and standards. Many have completed certificate programs in Naturopathy and do not possess as extensive training as Naturopathic Doctors. A distinction must be made between the three various forms of Naturopathic Practitioners. Dr Lust, the original founder was admintely opposed to the practice of Naturopathic Medicine and often referred to Naturopathic Medical Doctors as Pseudo Medical Men.

In the mid 1950s a branch of our ranks split off to create the American Association of Naturopathic Physicians (established 1970) they wished to practice as primary care physicians against the will of our founder. They created what is now known as "Naturopathic Medicine" Being a hybrid of Naturopathy and Modern Medicine. Till this day we are not in accordance with their decision and object to any legislation that would disenfranchise the profession as a whole.

## **Naturopathic Doctor Education**

ND education includes a 4 year didactic education that includes at least 100 hours of clinical practice as preceptorship. The education is a hybrid distance education combined with classroom education. The purpose of this is to provide strong hands on training as well as accommodate the ever growing needs of students in post secondary education.

Naturopathic Colleges operate under the laws and legalities of their various charted states. The college is under the supervision of a full time Dean as well as faculty. Classroom attendance is not less than 90% to be able to graduate. The college at this time must be recognized by the ANMA, the second oldest institution representing Naturopathic Doctors. American Naturopathic Medical Association.

To enter into the study of Naturopathy, the applicant must submit preliminary education issued by the state education authority. The student entering must have a high school diploma or equivalent as well as some form of Bachelor's Degree, preferably in the biological sciences such as biology, chemistry, etc.

The coursework is 4 school years of 36 weeks each. Each school week consists of not less than 25 clock hours of instruction, exclusive of laboratory and clinic attendance time.

Clinical internships must be approved prior to attendance with a qualified professional, ie. ND, DC, MD, PHD of various disciplines.

Class "A" curriculum for ND training contains a minimum of the following:

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as well as emotional coaching through behavior modification. Naturopaths remove the cause of disease by cleansing the toxic wastes of the body once identified. It supplies nutrient deficiencies, builds vitality, improves circulation, normalizes mental and emotional states, while employing various modalities to restore and maintain health. Naturopathy works with nature and assists the body in the ability to heal itself. Naturopathy is considered curative as long as the person's disease process has not taken over the balance of health within the body. Where disease process has overtaken the health it is recommended that a Naturopathic Doctor work integratively with an allopath to manage the disease. Naturopathic Doctors focus on the health of the body while allopaths study and balance disease processes within the body. Naturopathy is primarily preventative in nature while teaching and advocating strict adherence to laws of health, proper exercise, work, recreation, relation, and similar matters. Naturopathy does not use anything harmful to treat the patient. Although Naturopathic methods are simple and harmless they require great skill to administer properly.

## **Naturopathy differs from all other forms of Healing Arts**

1. Medicine seeks to cure the body by producing chemical reactions in the body by use of drugs, serum, toxins, antitoxins, vaccines, etc.
2. An Osteopath manipulates the muscles, joints, bones, etc in the belief that the primary cause is the impingement of the nerves and blood supply.
3. The Chiropractor adjusts the vertebrae in the spine on the theory that the pressure on the spinal nerves causes disease.
4. Physical Therapy treats the means of physical forces and energies only
5. Psychology is the study of what ails the mind only and does not take into account the physical impact of such ailments.
6. Naturopathy holds a distinction as a belief that the curative force is within the body itself and seeks to assist this natural force by use of physical and natural agents as well as methods including the impact of mindset, emotional wellbeing, actions, and behaviors.

Most chemical substances used in both the practice of Allopathy and in Naturopathic Medicine are foreign to the body and can be highly poisonous unless careful doses are given. Naturopathic remedies are found in nature, foods and take part in the bodily functions of the body as nature intended. Naturopathic Doctors stress the importance of preventing sickness and disease. They teach their patients how to stay well and are able to facilitate prevention in sickness as well as disease through public health education.

Dr Lust formed several Naturopathic Doctors schools with a goal of standardizing the profession. There still holds to be true a group of Naturopathic Doctors with whom would like to uphold the standards laid out by Dr Lust. These are considered Naturopathic Doctors. These Doctors have

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800 hours of Anatomy to include histology, embryology, dissection, osteology, etc.  
330 Credit Hours of Chemistry. Inorganic, Organic, Biochemistry, and Toxicology.  
270 hours of Physiology.  
300 Hours of Pathology.  
100 Hours of Bacteriology.  
200 Hours of Obstetrics and Gynecology.  
600 Hours of Diagnosis broken down into Physical, Laboratory, Xray, and Clinical.  
400 Hours of Theory, Practice, and Philosophy of Naturopathy.  
100 Hours of Pediatrics.  
100 Hours of Physiotherapy.  
100 Hours of Hydrotherapy.  
100 Hours of Electrotherapy.  
300 Hours of Anatomical and Manipulation.  
100 Hours of Psychiatry.  
300 Hours of Naturopathic Farmocopenia and Cell Salts Therapy.  
250 Hours of Protology, Fractures, Genito-urinary,  
100 Hours of Anesthetics, Minor Surgery, and First Aid.  
100 Hours of Eye, Ear, Nose, and Throat.  
395 Hours of Clinical Naturopathy.  
50 Hours of Jurisprudence.  
Total Credit Hours of 5345 including clinical hours to be completed in 4 years and 9 months.

Curriculum is a combination of reading, assignments, classroom activities, tests, quizzes, etc.

Upon completion, a proctored Board Exam is provided that is 4 hours long and tests a graduate candidate on skills, concepts, learned within the approved class curriculum. Currently, there are two prep courses that can be taken prior to the exam.

Currently, none of the Naturopathic Doctorate Schools have decided to become accredited through the Board of Education. The Board of Education does not create a standard in education and does not certify that the standard in education meets the standards within the field. Therefore Naturopathic Medical Programs cited in this study have not been certified for accuracy towards the Naturopathic profession. Because there is a lack of education in this profession, confusion, and miseducation the Naturopathic Medical Colleges have largely been able to pass as a Naturopathic school even though they have split off from the original Naturopathic roots as defined by the founder. Most recently, the Virginia College of Naturopathy has been formed and plans to go through all of the necessary requirements laid out by the Board of Education to create standardization of true Naturopathic Doctor education within the state of Virginia.

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### Flexner Report

The Flexner Report greatly impacted the growth of Naturopathy within Virginia as well as nationwide and created great fear as well as uneasiness amongst the natural healthcare profession. The Flexner report sought to discredit all natural health practices in favor of allopathic practices. The presentation of this report forced the removal of all natural occurring substances and the practice of natural health from all allopathic medical schools. Prior to this allopathic medical schools were relatively eclectic and included many natural remedies in practice in addition to allopathic practices. Many doctors of that era went to various trainings and many became NDs, DO's, MDs, and DC's all going to various schools for their prospective education.

### Naturopathic Doctor Distinctions

Naturopathic Doctors, or NDs, do not seek to replace the role of the Primary Care Physician. In fact, they choose to work alongside, in conjunction with, independent of as primary HEALTH providers. Naturopathic Doctors are Integrative Medical Providers. It is observed and understood that allopaths serve a role in the diagnosis, management, and treatment of disease yet have little if any education or training in the treatment of health. Naturopathic Doctors are trained in health. That is their role to maintain and educate the person on health. Naturopathic Medical Doctors, or NMDs, seek to replace the role of the primary care physician and believe they are qualified to diagnose, manage, and treat both diseases as well as maintain the health of the person. Naturopathic Doctors believe in working integratively with the allopaths when there is a disease present. They do not believe they are adequately trained to manage or diagnose disease, as we lack sufficient pathology as well as clinical residency.

There are three distinct professions:

Naturopathic Doctors are NDs. These are Doctors that are trained based on Dr Lusts standardization of Naturopathy. They complete a 4 year doctoral program, and take a Board Exam. The Diploma of these students read, Naturopathic Doctor (see attached).

Naturopathic Medical Doctors are NMDs. These are Naturopathic Medical Doctors who also receive some allopathic training in their education. Their diplomas clearly state Naturopathic Medical Doctor (see attached). They are not NDs or Naturopathic Doctors.

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(a). The bill would take the titles of "Doctor of Naturopathy", "Doctor of Natural Medicine" and "ND", "DNM" from duly studied and tested doctors who do not practice Naturopathy or Naturopathic Medicine but "Natural Medicine" and give it to a board of Naturopathy that regulates Naturopathic Medicine. (Note a board of naturopathy is regulating naturopathic medicine).

(b). Though the bill was amended and the provisions prohibiting those who had been licensed in Virginia prior to the sunseting and de-licensing of Doctors of Naturopathy in the state in 1980 the board was clearly stated in the law as a "board of naturopathy" NOT NATUROPATHIC MEDICINE.

(c) Naturopathic Medicine is mentioned in the Bill as being different from Naturopathy (Which we agree with) in 54.1-2900.

(d). It also Takes the title "Doctor of Natural Medicine" yet does not define what "Natural Medicine" is or why it is reaching to control anyone who uses a derivative of the term "Natural" and the word "Doctor"!

(e).Therefore, a clear distinction should be made between the 3 sets of Doctors this bill is aiming to regulate.

(d). It is not clear what title the license and board will be given to which practitioners or why the titles of all 4 sets are going to be given to one board that controls them all.

(e). No representatives of the 3 sets of Doctors are mentioned in the making of the board such as a chairperson from each set of doctored groups.

### Naturopathic Doctor Modalities

Naturopathic Doctors treat the person who has a disease, not the disease. Disease treatment is reserved for allopathic physicians and/or Naturopathic Medical Doctors depending on their jurisdiction. In treating the person, we awaken the person to the vital force of life energy within and help facilitate healing within the individual. The following are modalities that are employed by Naturopathic Doctors.

- Homeopathy
- Homeoprophylaxis
- Diet and Nutrition
- Lifestyle Modification

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Traditional Naturopaths are TNs. These are Naturopaths who have completed a certificate program in the basic principles of Naturopathy. They do not qualify to take a Board Examination and are not considered to be Doctors.

Doctor of Natural Medicine which is also indicated in this bill, refers to the use of alternative medicine modalities in practice less the emphasis on the biosciences. Natural Medicine is the use of naturally occurring remedies ie herbs, homeopaths, meditation, etc for treatment but does not go in depth into the laboratory component of the practice. They are less inclined to run labs, work with allopaths, and monitor treatment. They tend to be stand alone providers. These providers are considered DNM or Doctor of Natural Medicine designations. They typically complete a 3 year didactic training program with or without clinical requirements.

The Definitions in the bill as they pertain to the 4 classes of practices is not thoroughly stated or clear. We oppose these definitions as written for the following reasons.

(a).Naturopathy is NOT Naturopathic Medicine. Congressional record 1931 DC, was exhaustive in formally defining and codifying Naturopathy. Congress found that Naturopathy was not Allopathic or "Medicine". Naturopathy was not the use of drugs or surgery and that no law shall be made in respective states to disenfranchise Naturopaths discriminate as to what school they went to. (See Attached Congressional Record)

(b). No congressional record of the definition of Naturopathic Medicine has even been produced by the Doctors of Naturopathic Medicine.

© Naturopathic Medicine is separate and distinct from Naturopathy as cited in HB 1040 bill in 54.1-2900, yet it creates a "Board of Naturopathy" to license AND REGULATE "Doctors of Naturopathic Medicine" and "Naturopathic Medicine". The confusing amalgamation of the two separate fields is apparent and confusing to both legislators and the public.

(d). Though the bill makes mention of "Naturopathy" and "Doctors of Natural Medicine" the bill does not define what "Naturopathy" nor "Natural Medicine" is, though it does take the title and position it under the control of the board and make it illegal for anyone other than a select few the board deems "worthy" to be granted these titles. The bill only makes reference to the definition of Naturopathic Medicine! (Note this is not the definition given by congress!)

The bill mentions 4 different types of practitioners: Doctors of Natural Medicine (DNM), Doctors of Naturopathy (ND) and Doctors of Naturopathic Medicine (NMD), Traditional Naturopath (TN). We oppose these 4 groups being loosely traded for the following reasons.

- Behavior Modification
- Neurolinguistic Programming
- Functional Medicine
- Integrative Medicine
- Lifestyle Medicine
- Psychoneuroimmunology
- Energy Work ie Reiki, Hands on Healing, Touch for Health
- Herbal Medicine
- Nutraceuticals (Pharmaceutical Based Supplements)
- Hydrotherapy
- IV Therapy (under the supervision of an allopath)
- Manual Therapy
- Light Therapy
- Applied Kinesiology
- Iridology
- Cell Salts
- Clinical Hypnotherapy
- Light Therapy
- Breathwork
- Meditation
- Yoga
- Mantra
- Affirmation
- First Aid
- Laboratory Diagnostics
- Physical Education
- Mental Hygiene
- Philosophy of Natural Living
- Hygiene and Sanitation
- Public Health Education
- Clay, Earth Packs, Mud Packs

Naturopathy is not a cure all, yet is applicable to all parts of the body. Naturopathy is the only system that treats the body as a whole. It treats causes and not symptoms. Some cases are not suited for Naturopathic treatment and must be referred out to an allopath i.e. surgeries or specialists such as in the case of progressive cancers, tumors, etc. It has been found that 75% of persons seeking naturopathic treatment do so after medical, surgical, or other methods have failed them. A majority have found relief under naturopathic treatment which they did not find elsewhere. The demand for naturopathic treatment is increasing in demand and public acceptance

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grows daily. Medical schools do not teach naturopathic principles or methods of treatment. Therefore, patients cannot receive naturopathic treatment from medical doctors. Other systems of non-medical healing such as osteopathy, chiropractic are not complete systems of healing therefore are not equipped to give patients the complete treatment required to secure the desired results. Clinical records show many patients have achieved a cure under naturopathy after being pronounced incurable or hopeless by practitioners of other systems. Naturopathy is effective in long standing chronic conditions. Naturopathy uses similar diagnostic methods as medicine, but in addition uses peculiar diagnostics that are distinct in naturopathy, ie AK or Iridology. Early naturopathic treatment is preventative care that may inhibit the need for heroic measures later on. These principles of the classical naturopathic treatment are distinct from the practice of Naturopathic Medicine, as Naturopathic Medicine seeks to combine pharmacology alongside naturopathic care. In many states with advanced Naturopathic Medical Practice the use of opioids and various synthetic agents are used in conjunction with naturopathic practices and are prescribed by the same physician, an NMD. An NMD is considered a hybrid between a Naturopathic Doctor and an Allopathic Doctor. It is this distinction that proves dangerous as it is the observation that the NMD is inadequately trained in either profession, of allopathy or naturopathy. Many of the NMDs are not trained in more traditional diagnostic or therapeutic modalities as indicated by the Naturopathic Doctor training.

We do not agree with the expansion of Naturopathy to include allopathic medical practices as it is outside of the scope of practice for a Naturopathic Doctor. We work alongside allopathic doctors and do not serve to replace the primary care provider as in the case of the Naturopathic Medical Doctor.

As cited in the bill, "Practice of naturopathic medicine" means a system of primary health care for the (i) prevention, diagnosis, and treatment of human health conditions, injury, and disease; (ii) promotion or restoration of health; and (iii) support and stimulation of a patient's inherent self-healing process through patient education and use of naturopathic therapies and therapeutic substances.

#### Naturopathic Doctor Scope of Practice

- Laboratory Diagnostics
- Applied Kinesiology
- Case Taking
- Lifestyle evaluation
- Homeopathic Recommendations
- Homeoprophylaxis Administration
- Nutritional Counseling

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therefore they could not offer a Doctor of Naturopathy an exam on Naturopathic Medicine nor will they allow them to sit.

(b) There were no "Naturopathic Medical Programs" prior to "CNME" as the only science of health similar to it at the time was called "Naturopathy" Not Naturopathic Medicine", yet the bill highlights that one may apply for a license if he or she had graduated from a college which granted a degree of naturopathic medicine BEFORE CNME. There is clearly no such college nor was there ever!

(c) The National Board of Naturopathic Examiners (NBNE) Mentioned in the Landmark ruling of *Wendel Vs. Spenser (National Board of Naturopathic Examiners)* is not listed in the bill, yet it is as extensive and mentioned in the verdict and ruling as sufficient to license Doctors of Naturopathy. This board was established in 1951 before NABNE in 1970.

#### Naturopathy Standardization

Virginia Naturopathic Doctors Association was formed with the purpose of educating the general public and flushing out the distinctions between Naturopathic Doctors, supporting standardization within the profession, and continuing to progress the profession legislatively within the state. The VNDA is modeled after several Naturopathic Doctors Associations around the country.

In conclusion, the Virginia Naturopathic Doctors Association would suggest that if this bill were to be considered for passage that it.

1. Clearly define the difference between a Doctor of Naturopathy (ND), Doctor of Naturopathic Medicine (NMD), Traditional Naturopath (TN), and a Doctor of Natural Medicine (DNM).
2. That more than one board of accreditation be added to the bill for schools and colleges of both Naturopathy and Naturopathic Medicine alike such as ANMAB and Congressionally Chartered Colleges.
3. That more than one national examination for competency testing of Naturopathic Doctors be added such as the National Board of Naturopathic Examiners Exam (NDLEX) and the American Naturopathic Medical Certification Board Exam (AMNMCBE)
4. That a reasonable explanation to why the bill is reaching into the realms of all "Natural Medicine" be given and absolute power over any designation of "Natural" and "Doctor" if the only candidates eligible by law and this bill to be granted all 3 designations and licenses are

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- Behavior and Habit Modifications
- Lifestyle Recommendations
- Whole health recommendations
- Herbal recommendations
- Administering Hydrotherapy
- Administering natural substances (i.e. mud packs, salt scrubs, castor oil packs, etc)
- Naturopathic Manipulation and Manual Therapy
- Use of air, light, water, earth for treatments

#### Naturopathic Medical Doctors

Graduates of only an approved school by the "Council on Naturopathic Medical Education" would be even "considered" for licensure.

(a) The Council on Naturopathic Medical Education only accredits colleges to give the title of "Doctor of Naturopathic Medicine" (NMD) not "Doctor of Naturopathy" (ND) as proof please find the graduates diplomas with the title given by the 5 naturopathic medical colleges.

(b) The American Naturopathic Medical Accreditation Board is the same age as the Council on Naturopathic Medical Education both residing and registered in the district of Columbia in 1973 and accrediting schools and colleges on Naturopathy. This Board regulates schools that provide the title Doctor of Naturopathy.

(c) There exists 2 Congressionally chartered colleges that are not included in the bill- The American School of Naturopathy and the First National University of Naturopathy and Allied Sciences.

(d) No mention of colleges of "Natural Medicine" or leading to the designation of "Doctor of Natural Medicine" (DNM) are noted nor cited in the bill. Doctor of Natural Medicine is a separate distinction from Doctor of Naturopathy, Doctor of Naturopathic Medicine, or Traditional Naturopath. Doctor of Natural Medicine primarily focuses on the modalities within Naturopathy and less on the biosciences.

The only acceptable exam as a prerequisite for licensure is the "NPLEX" Or (Naturopathic Physicians Licensing Examination) administered by the North American Board of Naturopathic Examiners.

(a) The North American Board of Naturopathic Examiners does not accept graduates to sit for testing unless they are from schools accredited by the CNME and follow Naturopathic Medicine,

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those who have graduated with a degree from a college of "Naturopathic Medicine" approved by the Council on Naturopathic Medical Education".

Unless these amendments be added then there is no way that this bill can be found to be in the best interest of the public and the commonwealth of Virginia and would cause a monopoly of ALL THE NATURAL HEALTH REALM to those graduates of schools approved by the CNME and only clearly license Doctor of Naturopathic Medicine, which distinction is not mentioned in the bill.

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UNITED STATES OF AMERICA



# Congressional Record

PROCEEDINGS AND DEBATES OF THE 76<sup>th</sup> CONGRESS, THIRD SESSION

## NATUROPATHY

### EXTENSION OF REMARKS

HON. KATHERINE G. LANGLEY  
OF KENTUCKY  
IN THE HOUSE OF REPRESENTATIVES

Saturday, February 7, 1931

Mrs. LANGLEY. Mr. Speaker and Members of the House, as author of H. R. 12169, a bill to amend the meaning and intention of an act of Congress, entitled "An act to regulate the practice of the healing art; to protect the public health of the District of Columbia," approved February 27, 1929, I wish to point out the error in the action of the Commissioners of the District of Columbia in denying the full definition of naturopathy as embodied in the original bill H. R. 12169.

I wish also to call attention to the misleading statement as issued to the public through the medium of the press that naturopathy desires the authority to use drugs and to perform surgical operations, as follows:

#### COMMISSIONERS SET BEFORES HEADS—CAPITAL HEADS RECOMMEND ADVERSE ACTION ON BILL OF NATUROPATHISTS

Efforts of the naturopathists to extend the legal scope of their healing activities struck a snag yesterday when the District Commissioners asked Congress not to enact the pending bill authorizing naturopathists to administer drugs. Definition of "naturopathy" was one of the difficult tasks confronting the Commission on Licenses of the Healing Arts. The definition proposed by the naturopathists was so broad as to include every branch of healing. The definition finally adopted provided for the licensing of naturopathists, but the definition restricted them from administering drugs or performing operations on the person. Apparently the naturopathists wanted broader fields of activity and had introduced a bill upon which the Commissioners commented so adversely yesterday.

Naturopathy has always been known as a system of drugless healing and it would seem, therefore, that internal medication could have no part whatever in their method of healing. For these reasons the Commissioners recommended an adverse action on the bill.

Naturopathy does not contemplate drugs and surgical operations, nor is it within the scope of their science of practice. To the contrary, they do not use or prescribe drugs as a part of their treatment, nor do they advocate or perform surgical operations upon their patients. I herewith submit as part of these remarks, under leave granted me, the report of the House Committee on the District of Columbia, House Report No. 2432, Seventy-first Congress, Third session, to clarify the meaning and intention of act to regulate the practice of the healing art.

77774-18610

The Committee on the District of Columbia, to whom was referred the bill (H. R. 12169) to amend the meaning and intention of an act of Congress entitled "An act to regulate the practice of the healing art; to protect the public health of the District of Columbia," approved February 27, 1929, having considered the same, report back to the House with the recommendation that the legislation be passed.

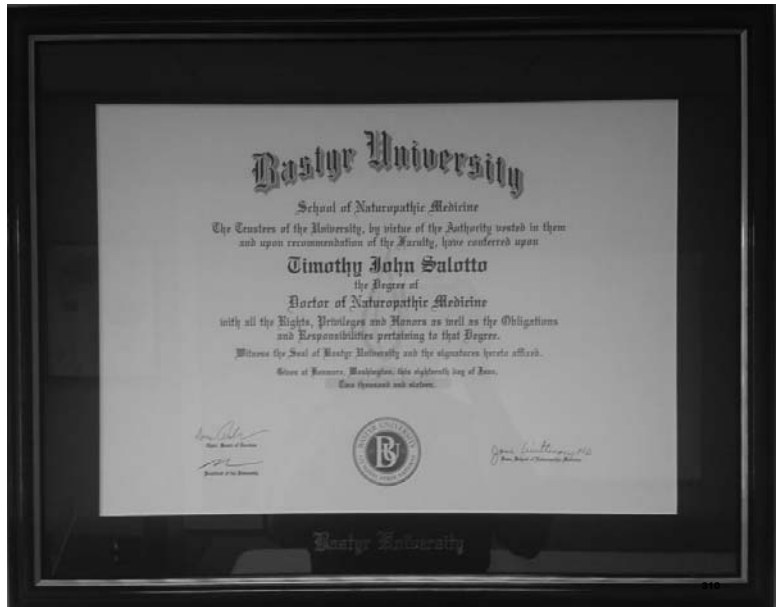
The purpose of this bill is to clarify the definition of naturopathy. The Commissioners of the District, in defining the type of work that might be performed by the naturopaths under the act of February 27, 1929, excluded from their definition the right of naturopaths to diagnose the case or to administer drugs, medicines, or perform surgical operations. The naturopaths are not concerned with the use of drugs, and do not desire to perform surgical operations, because naturopathy does not contemplate drugs or surgical operations, nor is it within the scope of their science or practice. They have advised the committee that never, as any part of any such treatment, have they ever used drugs or ever performed or attempted to perform any surgical operation.

Naturopaths practice and teach that the living body is a vital machine, and that the retention of waste products in the body and the nonelimination of drugs are considered the most underlying causes of disease, so that they could not consistently prescribe them.

Naturopathy, they aver, is a system of natural methods comprising the use of air, earth, sunshine, water, heat and cold, harmonized food, the use of dehydrated vegetables, herbs, fruits, and any natural modalities and it is their belief, and the belief of this committee, that they should not be excluded from the use of vegetable oils and herbs, fruits, and any other natural modalities in their practice.

The committee, therefore, recommends the early passage of this measure so that the type of service to be performed by those in the naturopathy profession may be clearly defined.

A naturopath claims when waste matter, plomaines, or poisonous alkaloids and acids produced in the body, as a result of wrong diet and other violations of Nature's laws, have brought about destruction and corrosion in vital parts of organs, when dislocations and subluxations of bony structures or new growths and accumulations in the forms of tumors, stones, or gravel obstruct the blood vessels and nerve currents, shut off the supply of the vital fluids, and thus cause malnutrition and gradual decay of the tissues. When in addition to this the organism has been poisoned or mutilated by drugs and surgical operations, not only must the mechanism of the body be cleaned and freed from ob-



## An Act of Congress

Passed February 7, 1931

THE FOLLOWING DEFINITION OF NATUROPATHY was passed by the United States Congress on February 7, 1931, without a dissenting vote. There was very great opposition by 35 medical doctors present, by the Board of Commissioners of the Healing Art (allopathic), and by special representatives and attorneys of the American Medical Association and other allopathic forces.

"Section 2. It is further enacted that 'NATUROPATHY,' as used in the aforesaid Act, approved February 27, 1929, hereafter shall comprehend, embrace, and be composed of the following acts, practices, and usages, ---

"DIAGNOSIS and PRACTICE of physiological and material sciences of healing as follows, ---

"The physiological and mechanical sciences such as mechanotherapy, articular manipulation, corrective orthopedic gymnastics, neurotherapy, PSYCHOTHERAPY, hydrotherapy, and MINERAL BATHS, electrotherapy, thermotherapy, phototherapy, chromotherapy, vibrotherapy, thalmotherapy, and DIETETICS WHICH SHALL INCLUDE THE USE OF FOODS OF SUCH BIOCHEMICAL TISSUE-BUILDING PRODUCTS AND CELL SALTS AS ARE FOUND IN THE NORMAL BODY; and the use of vegetal oils and dehydrated and pulverized fruits, flowers, seeds, barks, herbs, roots, and vegetables un-compounded and in their natural state.

"Passed the House of Representatives February 7, 1931. Attest: Wm. Tyler Page, Clerk."

Thus all mineral baths of any and all natural elemental, and tissue and cell chemicals and salts required for the health of the body organism, and for all its functions of health and wellbeing, - are authorized in usage as the legitimate right of each and every person in NATUROPATHIC PRACTICE, by a definite and specific Act of the United States Congress.

And as any Act of Congress is a SUPREME BILLING above any contrary laws of the individual States, - this Act at once exempts any and all NATUROPATHIC PRACTITIONERS from the medical and legislative restrictions in the various States; giving Naturopaths freedom to practice Naturopathy in any and all its departments according to their professional schooling and training.

Therefore now and hereafter any graduate of any department of Naturopathy who according to his or her skill and training diagnoses sickness, disease and ailments, and who treats the sick, diseased and suffering, and all and varied human ailments and afflictions according to the methods and processes here defined; and who restores health and wellbeing by the processes and methods outlined in this Act of the United States Congress, - ARE NOT PRACTISING MEDICINE OR SURGERY WITHOUT A LICENSE, as formerly asserted by the allopathic trust, and as specified by their various legislative enactments. They are rightfully and legitimately practicing NATUROPATHY.

And thus this Act nullifies all such legislative enactments; for the Federal Law -- the Laws of the United States Government at Washington -- ARE THE SUPREME LAWS OF THE LAND.

For so it is written in the Constitution, - "THIS CONSTITUTION, AND THE LAWS OF THE UNITED STATES WHICH SHALL BE MADE IN PURSUANCE THEREOF, (this includes all Acts of Congress) - SHALL BE THE SUPREME LAW OF THE LAND; and the judges in every State shall be bound thereby, - ANYTHING IN THE CONSTITUTION OR LAWS OF ANY STATE TO THE CONTRARY NOTWITHSTANDING." - Article Six, Clause Two. 312

On Mon, Aug 17, 2020 at 3:53 PM gina martin <ginamartin03@hotmail.com> wrote:

I wish to support the licensing of naturopathic physicians in the state of Virginia. My experience with them has proven them to be competent primary care providers, and their education of four years of medical school certainly supports this as well.

I am a retired nurse practitioner of 20 years experience, and my conversations with naturopathic physicians has revealed a breadth of knowledge, as well as a focus on promising alternative medicine that eludes osteopathic physicians.

Certainly in these times as well, there is a growing population which has a distrust of traditional medicine, and I fear these people avoid getting any care at all for chronic conditions. Naturopathic physicians could serve well in this population.

Sincerely

Gina Martin, RN  
(Retired ACNP)  
Sent from my iPad

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August 17, 2020

Dr. Elizabeth Carter  
Executive Director for the Virginia  
Board of Health Professionals

Dear Dr. Carter and Members of the Committee,

I am writing in support of licensing and regulation of naturopathic doctors in the Commonwealth. My name is Peyton T. Taylor, Jr. and I have been licensed to practice Medicine and Surgery in the Commonwealth of Virginia since 1969. I am Board Certified in Obstetrics and Gynecology and in Gynecologic Oncology. I have retired from medical practice and I am a Professor Emeritus of the University of Virginia. I also have a daughter who is a graduate from one of the accredited schools of Naturopathic Medicine.

Over the course of many years in practice, I have worked collaboratively with selected medically-trained naturopathic doctors to assist patients with symptoms related to their malignancy or chemotherapy such as chronic fatigue, GI disorders, depression, sleep disturbances, nausea, difficulty coping and those seeking nutritional advice. Medically-trained naturopathic doctors are specifically trained in preventative work aimed at restoring health. I have found these collaborations to be extremely helpful to those patients.

I wish to comment upon several issues under consideration by the Board:

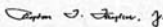
- 1) **Risk of harm.** I have found health professionals as well as the general public confused by the differences in the levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath or even health store workers. I think it is paramount to for the Commonwealth to establish licensure and a regulatory framework for medically-trained naturopathic doctors to both promote safety and improve access to patient-selected care. This is standard for accountability for all medical professionals providing patient care. From my perspective, only medically-trained naturopathic doctors, who have received doctoral degrees from federally-recognized accredited programs, should be able to use the title "naturopathic doctor". It seems essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training by a profession formally recognized and regulated by the Virginia Board of Health Professions.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of medical education and training; skills they acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year on-site medical education program, and complete board exams in both basic health sciences and clinical skills. They also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.
- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions and practice in collaboration with their patients' collective care teams.

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- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness and a valuable addition to our public health system.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access, particularly those patients with limited "disposable income" and reducing out of pocket costs for all patients. Additionally, licensing is the first step towards some level of insurance coverage for patients. I understand that naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit insurance for coverage. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.

Licensing medically-trained naturopathic doctors will provide additional, safe health care access patients within the Commonwealth of Virginia and I respectfully urge the Board to recommend their licensure and regulation.

Sincerely,



Peyton T. Taylor, Jr., M.D., M.Sc., FACOG, FACS

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From: Margaret Barton <margaretmaggiebarton@gmail.com>

Date: Mon, Aug 17, 2020 at 4:01 PM

Subject: urging the Board of Health Professions to recommend licensure for medically-trained Naturopathic Doctors  
To: <elizabeth.carter@dhp.virginia.gov>

August 17, 2020

Dear Members of the Committee,

My name is Margaret Barton, I have been a Virginia resident for 20 years and I have been under the care of a naturopathic doctor for over 5 months due to heavy metal poisoning. I am writing in support of full licensure for medically-trained naturopathic doctors. I feel the naturopathic doctors fill the void in medicine by providing in depth knowledge of the plant based supplements that can be used to heal our bodies, along with nutritional information to maintain optimal wellness.

My family suffers from the genetic MTHFR mutation, which prevents the body from absorbing Folic Acid. I need a daily regimen of supplements vitamins B-6 and B-12, methionine, 5-methyltetrahydrofolate (5-MTHF) to keep my body functioning. I do have heart, thyroid and IBS due to the high level of homocysteine in my blood from the genetic mutation. Recently I found my well water to have high levels of Copper and Lead. I sought out a naturopathic doctor to guide me through the detox process with natural supplements, nutritional guidance and medical testing. We meet and discuss my progress and medical issues I developed like chronic fatigue, joint pain, and insomnia. Using herbal remedies, that use to be a common element in medical treatments before the modern age of synthetic chemicals provided by big pharmaceutical companies, we find remedies that aid in the treatment and healing of my body.

Our State of Virginia needs to recognize the unique skills that the naturopathic doctor bring to us for holistic healing. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. It's time to give the citizens of Virginia a choice in selecting their healthcare providers to suit their unique needs and beliefs in alternative medicine. Having lived eight years in Great Britain, the general public sought out herbal remedies at the "Chemist" store before going to see a doctor. They had relied on these remedies for centuries from generation to generation. Why then should we not welcome the doctor of naturopathic medicine to join our ranks here in Virginia.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend full licensure for naturopathic doctors in Virginia.

Sincerely,

Margaret Barton

Fredericksburg, VA 22406

114 316

On Mon, Aug 17, 2020 at 4:15 PM Mary Laposata <marylaposata@gmail.com> wrote:  
August 17, 2020

Dear Members of the Committee,

My name is Mary Laposata, I have been a Virginia resident for about 40 years and I have been under the care of a naturopathic doctor for over 7 years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors. I have personally greatly benefited from working with a medically-trained naturopathic doctor all these years. As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the six criteria.

1) Risk of harm.

There are traditional naturopaths who call themselves naturopathic doctors, but who never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training. There is risk of harm in all medical professions; while medically-trained naturopathic doctors are generally low-risk, there needs to be the same level of professional accountability and standards as the other regulated health professions in Virginia. As a patient, I also want to know that if an ND causes harm, they will be disciplined by a regulatory board with the authority to restrict a practice license - not just sued in civil court or reported to a business bureau.

2) Specialized skills.

Naturopathic doctors consider the patient's health holistically. They are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between convention and traditional medicine practice. While many of the healthcare services that NDs are trained to provide are shared with other medical professions, NDs do have specific education in certain areas that aren't included or emphasized in other practices.

3) Autonomous practice.

Naturopathic doctors practice autonomously in all other jurisdictions that offer regulation. I see my medically-trained naturopathic doctor specifically because other medically providers do not have the same training and knowledge in both conventional and natural medicine. I also trust my ND to refer me to a specialist or another healthcare provider, in order to ensure the best care possible.

4) Scope of practice.

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On Mon, Aug 17, 2020 at 4:17 PM Cassandra Mannhardt <cmannhardt@gmail.com> wrote:  
Dear Members of the Committee,

Thank you for the work you have done regarding the regulation of the practice of naturopathic doctors in Virginia. My name is Cassandra Mannhardt. I have been a Virginia registered nurse for over 36 years and a naturopathic doctor for over 13 years.

I love Virginia but was not going to return after getting my degree in naturopathic medicine due to the lack of licensing here in our Commonwealth. However, my husband's job has brought me back. Although I feel like I am home, I struggle on a daily basis with the limits of what I can do in helping people since I am not able to practice to the scope of my training.

I've seen a lot in my many years working in the health profession and know the importance of regulation to ensure accountability in public safety. Without regulation it is very difficult for the public to differentiate between different practitioners' education, skills, competency, and ability to deliver accurate and safe information and care.

We are medically trained as a distinct group of providers. Our schools are four-year on site medical programs and we have board exams in basic sciences as well as clinical board exams covering pharmacology, nutrition, botanical therapies, and physical medicine. We are experts in the field of natural therapeutics and are the most equipped practitioners to understand the interplay between conventional medicine and natural medicine. We understand the interactions between botanical medicine, nutrition, and pharmacotherapy.

Naturopathic doctors practice independently in all twenty-five us jurisdictions that regulate naturopathic practice. However, I have accompanied people a number of times on their visits with their primary care physicians to facilitate collaboration and seamless care. This has been very beneficial, especially for the elderly who sometimes feel overwhelmed and have trouble understanding their doctors directions.

I also believe that it is very important for the naturopathic profession to have the power to regulate itself by holding its members accountable through suspension or revoking of licence. This helps protect the public from potential harm or abuse.

The last point I would like to make is the importance of the appropriate level of regulation for medically-trained health care professionals. Registration and certification do not adequately distinguish between lay naturopaths and medically trained naturopathic doctors. This is one of the primary purposes of licensure in all of the States and territories that currently regulate naturopathic doctors.

I respectfully urge the Board to recommend licensure for medically trained naturopathic doctors

Sincerely,

Dr. Cassandra Mannhardt, ND, RN

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Currently, medically-trained naturopathic doctors can't offer physical exams, or order labs or imaging; they cannot not even test for COVID-19 or run a basic complete blood count. They are not allowed by law to give a medical diagnosis for my medical records, and must refer me to another medical practice to access essential healthcare services that I would otherwise choose to receive from an ND.

Medically-trained naturopathic doctors would be well equipped to provide these basic health care practices, eliminating the need for added appointments. Many primary care providers are retiring, and this is increasing the shortage of primary care providers. This, combined with the increasing needs of the public during the pandemic (especially for mental health support), means that patients are now requiring more access to providers who are well-trained to provide medical services.

5) Economic impact.

Licensing medically-trained naturopathic doctors would reduce the burden on our existing system by creating additional access for patients. Licensing would also pave the road to insurance coverage. Currently medically-trained naturopathic doctors are unable to use proper coding that would enable insurance coverage. In this era of chronic disease, where it's burden and impact fall disproportionately to the medically underserved, Virginians need increased access the preventative healthcare services that medically-trained naturopathic doctors are so well suited to provide.

6.) Alternatives to regulation.

There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors. As a patient and a consumer, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the patients most in need. I respectfully urge the Board to recommend licensure for naturopathic doctors in Virginia.

Sincerely,

Mary Laposata  
Midlothian, VA

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August 17, 2020

Dear Members of the Committee,

Thank you for your thorough work regarding regulation of the practice of naturopathic doctors in Virginia. My name is Viktoriya Bely, and I have been a naturopathic doctor for over 4 years. I am writing in support of full licensing medically-trained naturopathic doctors. I have had the privilege of working in the Richmond, VA community for over 2.5 years and have met many unexpected challenges since moving from my fully licensed state of Oregon. One of my main concerns is the inability to order labs, even standard screening bloodwork, or imaging which could save time for the patient and their primary care provider. It would relieve some of the burden that medical doctors experience when patients go to them to write lab orders. I have been fortunate enough to work with many different populations in Richmond, but the discrepancy I find between getting an accurate and timely diagnosis between women of color and Caucasian women is concerning. The women of color have a much harder time getting their doctors to believe their pain and scheduling imaging and lab work for diagnosis. It takes them much longer to get a diagnosis of endometriosis or PCOS, which can be debilitating conditions. They must act as advocates for themselves and push for testing, whereas as a naturopathic doctor I am trained in diagnosis and treatment of such conditions and should be able to advocate for them. This will relieve some of the burden for other practitioners, which is part of the delay in diagnosis. With the COVID-19 pandemic we are all stretched thin. Naturopathic doctors can be an additional support in preventative medicine and chronic disease.

With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) **Risk of harm.** The general public does not know the difference in levels of education, training, and experience between a medically-trained naturopathic doctor and a traditional or lay naturopath. Licensure provides a regulatory framework, transparency and promotes safety. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. All medical professionals should have accountability and safety which is why naturopathic licensure is critical.
- 2) **Specialized skill and training.** Medically-trained naturopathic doctors are a distinct group of providers. They go through a rigorous, and yet, fundamentally distinct type of training; skills they acquire are unique compared to lay naturopaths and other medical providers. They take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The COVID-19 pandemic, in combination with the crisis of chronic disease, necessitates increased access to specialized professionals who have expertise in prevention.

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Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

- 3) **Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) **Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventative services that medically-trained naturopathic doctors are trained to provide. Naturopathic doctors could serve as an additional provider to help us deal with our current health crises.
- 5) **Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia. There are a number of naturopathic doctors that live in Virginia that choose to practice in Maryland and DC. This means dollars and taxes are being spent elsewhere than in Virginia. Licensing of naturopathic doctors is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill.
- 6) **Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors don't have adequate recourse. They could choose to file a complaint with the Attorney General, or file a lawsuit or contact the Better Business Bureau but it doesn't protect future patients.
- 7) **Least restrictive regulation.** Licensing is the appropriate level of regulation for medically-trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them license naturopathic doctors. Enacting certification or registration does not adequately distinguish between licensable, medically-trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process doesn't offer any objective, and doesn't distinguish between medically-trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. I respectfully urge the Board to recommend licensure.

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On Mon, Aug 17, 2020 at 4:30 PM Sarah Mae <[sarahmannhardt@gmail.com](mailto:sarahmannhardt@gmail.com)> wrote:  
Dear Members of the Committee,

My name is Sarah Mannhardt. I've been a resident of the state of Virginia for 3 years now, and have been under the care of Naturopathic doctors numerous times over the last 15 years. I'm writing to urge you to allow Naturopathic doctors to be licensed in our state.

Last year I was diagnosed with an aggressive form of breast cancer. Over the time of my diagnosis, I began searching for treatment options. While I chose to use the traditional medical route of chemotherapy, surgery and radiation, it was very important to me to have the advice of a naturopathic, integrative doctor who could give me medical advice from a holistic perspective. Because Virginia does not allow naturopathic doctors to be licensed, I had to seek counsel from a naturopathic doctor based in Vermont. Dr. Matthew Perchimeleides, ND, was able to give me specific advice that I was able to implement alongside the advice of my oncologist, with my oncologists approval. By the time of my surgery following 5 months of chemotherapy, my tumor had shrunk from 4 1/2 cm to smaller than a pea, there was no invasive cancer left, and my lymph nodes were completely free of cancer. I went from needing a mastectomy to being able to have a minimally invasive lumpectomy. My oncologist was very surprised at my results. He told me that estrogen positive cancers rarely ever disappear with chemotherapy the way mine did. He was extremely pleased. I firmly believe that the medical advice I received from my naturopathic doctor played a large part in my positive results, and had I not followed Dr. Perchimeleides advice on diet, exercise, and supplements, as a young woman with an aggressive form of breast cancer, I highly doubt I would have had the same results.

I believe it's critically important that other cancer patients like myself here in Virginia have access to Naturopathic doctors who are able to use integrative methods to support them during treatment. Because I have an aunt with a degree in naturopathic medicine, I was able to locate a naturopathic doctor out of state who was able to help me. But many other Virginians critically in need of care don't have that luxury. Please, seriously consider allowing Naturopathic doctors to be licensed in our state. You could make a huge difference in the lives of many people.

Sincerely,  
Sarah Mannhardt

Sincerely,

*Viktoriya Belyi, ND*

Viktoriya Belyi, ND

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August 17, 2020

Dear Members of the Committee,

My name is Joel Thornbury and I am a pharmacist that graduated from the University of Kentucky, School of Pharmacy in 1992. I have served as an independent pharmacist in Eastern Kentucky and Southwest Virginia providing ambulatory care where I run and operate pharmacies within Kentucky, Virginia and Tennessee. I have overseen pharmacy interns and medical interns over the last 25 years. I am a third generation Kentucky pharmacist where I was appointed by the Governor to the Kentucky Board of Pharmacy and completed my tenure in 2013. I currently serve as the President of the Kentucky Pharmacist Association where much of my work has been in creating additional access to care for patients to meet the varied needs of Appalachians and to assist with the changing needs of pharmacists.

I have had the opportunity to work with naturopathic doctors for over 12 years. Naturopathic doctors are trained within a variety of therapies ranging from pharmacotherapy to nutrition and even botanical medicine. This is useful in rural settings due to the lack of access to care. Naturopathic doctors have served as integral members to assist with opiate addiction within Appalachia where they have assisted with behavioral modifications, nutritional status improvements and identified therapies to assist with sleep and anxiety as well as depression. They can also provide lifestyle modifications to assist with cravings and triggers.

But naturopathic doctors provide far more training and skills that are being underutilized due to the lack of licensure within Virginia. These skills would be useful within rural and urban settings to combat issues around access to care and chronic disease. Naturopathic doctors are trained in physical exams, laboratory testing, imaging, pharmacy and minor surgery.

Many are trained as primary care providers where additional patients could be served. Because naturopathic doctors believe in prevention it makes them a useful partner in combating addiction and other chronic diseases including smoking, hypertension, obesity and diabetes. All of which are specific comorbidities within Appalachia and prevention will continue to be the key to changing our outcomes.

Below outlines my recommendation for their licensure as referenced by the 7 Criteria of the Department of Health Professions:

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1) Risk of harm- At this time there are lay providers using the same title as naturopathic doctors. This provides confusion to consumer and especially to those that may not have the foresight to understand educational differences. It also provides confusion for referrals among medical providers. Few medical providers know the differences between lay naturopaths and naturopathic doctors. Additionally, because naturopathic doctors are not licensed they do not have access to Prescription Monitoring Programs (PMP) which is vital to combating issues around addiction but also mismanagement or duplications of drug therapy. All medical providers should have access to PMP for safety of patients and the general population.

2) Specialized skills- As noted above naturopathic doctors have specialized skills in pharmacy, botanical medicine, physical medicine, clinical nutrition, homeopathy and also minor surgery and IV therapy. They serve as the "old school" doctors and such doctors are well accustomed to rural settings. They also have specialty training in prevention and serve as the doctors that approach patients through a holistic view. They don't just look at one illness or one ailment but look at the entire picture. They also work on some of the most challenging cases that have failed modern therapies where they work to restore function and provide the best quality of life for each person. Much of our economy has been built on coal and naturopathic doctors have worked to restore and uplift those with occupational injuries.

3) Autonomous practice- In the states or provinces where naturopathic doctors are licensed they all practice autonomously. They are trained as doctors and thus oversight by other medical providers is unnecessary.

4) Scope of practice- In states that license naturopathic doctors there can be a varied scope. Even though naturopathic doctors are trained in pharmacy, botanical medicine, nutrition, homeopathy, minor surgery and IV therapy it doesn't mean that each state chooses to adopt the same scope. This is not surprising because each state has its own specific needs. Likewise, within pharmacy practice, some states permit pharmacists to order laboratory testing and some permit prescriptive authority for infections such as streptococcus. Each state must discern the scope that is needed and within Virginia we have a varied landscape of rural and urban settings. Within urban settings there may be more access to minor surgery or prescriptive authority but in Appalachia and other rural settings, patients have few providers as it is and thus the lack of prescriptive rights could be a hardship. Medications such as antihypertensives and antihypertensives as well as antibiotics are urgent therapies that without them have significant consequences in acute and chronic disease. The State of Virginia should consider this when they look to determine scope in order that appropriate access to care is available for the most vulnerable.

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5) Economic impact- If naturopathic doctors had the ability to truly practice in the State of Virginia it could decrease healthcare costs. Due to the fact that naturopathic doctors provide preventative medicine and restoration for those with addiction, pain, and also chronic disease it could reduce the burden and healthcare costs. We know that for every \$1 spent on prevention we save \$7-10 in direct costs and greater than \$25 in indirect costs. The healthcare system is struggling because the lack of prevention has not been a priority for years. Naturopathic doctors if licensed could serve as an additional primary care provider in the State to reduce costs and promote additional access to care. In certain states naturopathic doctors serve as Medicaid providers- this could be useful in areas such as Appalachia.

6 & 7) Alternatives and least restrictive regulation- There is no current alternative to licensure and licensure serves as the least restrictive option that provides transparency and safety to the public. Every medical profession needs oversight and compliance is key. No current alternative options exist for professional and ethical standards of medicine. Naturopathic medicine should be no different.

Thank you for your time and consideration. I ask that the Board move forward with a recommendation of licensure for naturopathic doctors.

Sincerely,

JOEL

Joel Thornbury, RPh  
Family Drug (Vansant, VA)  
Haysi DrugCenter (Haysi, VA)  
Care More Pharmacy (Dorton, KY)  
NOVA Pharmacy (Pikeville, KY)  
606-424-1099

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Richard S. Nicholas, PharmD, ND, CDCES, BCPS, BCACP  
204 Winterbrook Circle  
Kingsport, TN 37663

[rnicholas@acp.edu](mailto:rnicholas@acp.edu)

(423) 440-9286

On Mon, Aug 17, 2020 at 4:40 PM Ann Duvall <[anngrauduvall@gmail.com](mailto:anngrauduvall@gmail.com)> wrote:  
Dear Members of the Committee:

Thank you for all the work the committee is undertaking with regard to the regulation of Virginia's naturopathic doctors (NDs). As a resident of Virginia for over 30 years, I am writing to you today to share my personal and professional reasons for supporting licensure.

I have been under the care of several naturopathic doctors at various times since I moved to Virginia and received appropriate care because of their unique approach: having the diagnostic skills of an MD, yet providing me with the option to use all natural non-invasive therapies to treat the whole person. I am fortunate in that I have had excellent care and been able to work integratively with NDs while not only managing my own compromised immune system, but also as a caregiver for a daughter with a life threatening illness.

Discerning, both personally and professionally as a licensed mental health provider, how best to integrate allopathic and naturopathic approaches, has come as a result of my own research, personal experience, education, and the good fortune of having caring NDs at my side. Everyone should have this access to integrative wellness, and having fully licensed medically trained naturopathic doctors will serve Virginians with appropriate oversight and accountability to provide safe medical care for those seeking treatment. Given the shortage of medical professionals at this time, we need access to the care that NDs can provide with their ability to coordinate with other health professionals in the state across many disciplines, especially given their rigorous training and licensing requirements in various therapies, including nutrition, pharmacology and physical medicine.

Finally, I support licensure for NDs in Virginia because of the hardship on patients not being able to submit insurance for services because of the inability for NDs to use coding with their billing, something I have personally experienced as a patient and caregiver. I respectfully urge the Board to recommend licensure and give more Virginians access to cost effective, safe and accountable health services.

Respectfully submitted,

Ann Duvall, LPC

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August 17, 2020

Regulatory Research Committee  
Virginia Department of Health Professions  
Perimeter Center, 9960 Mayland Drive, Suite 300  
Henrico, VA 23233-1463

Dear Committee Members,

I want to thank you for your thoughtful and thorough work regarding regulation of the practice of naturopathic doctors in Virginia. Under the circumstances of the COVID-19 pandemic, I appreciate the time the committee has invested in writing such a balanced and fair report.

My name is Richard Nicholas and I graduated naturopathic medical school over 13 years ago (Bastyr University, Class 2007). Prior to attending naturopathic medical school, I was a practicing pharmacist for nine years. I continue to practice pharmacy and have been a faculty member at the Appalachian College of Pharmacy located in Oakwood, Virginia for over 10 years. I currently serve as the college's Chair of the Department of Pharmacy Practice. During that 10-year period, I have maintained an ambulatory care practice in a family medicine clinic as well as worked as a part-time community pharmacist throughout Southwest Virginia (VA Rx license #0202209727).

I am writing in support of fully licensing medically trained naturopathic doctors.

I moved to the area to help fulfill the Appalachian College of Pharmacy's mission to improve the health of medically underserved areas. As a medically trained naturopath, I have a unique set of skills that address the underlying problems of chronic disease. My naturopathic training has provided me the tools to address the diet and life-style factors that are contributing to the epidemic of obesity, diabetes, cancer, respiratory disease, and cardiovascular disease. In addition to addressing pharmacotherapy issue, the majority of my time is invested in addressing nutrition, physical activity, and life-style interventions that foster health, not disease. Skills that my conventionally trained colleagues never learned.

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With every medical profession, it is important to have oversight to ensure accountability and public safety. Speaking to some of the seven criteria used by the Board, as they relate to licensing naturopathic doctors:

- 1) Risk of harm.** The public does not know the difference in levels of education, training, and experience between a medically trained naturopathic doctor and a traditional or lay naturopath. Licensure and a regulatory framework will provide clarity – while also promoting safety and access to patient-selected care. At present, lay naturopaths are able to assume the title of 'naturopathic doctors', which confuses not only the public, but also other providers in the health care system. Only medically trained naturopathic doctors, who have received doctoral degrees from federally recognized accredited programs, should be able to use the title "naturopathic doctor". It is essential for the public to be assured that anyone who presents themselves as a "doctor" has commensurate medical education and training. I would also submit that all medically trained professionals pose some degree of risk of harm, and they should be held to account by a regulatory board for the safety of patients. This is standard for all medical professionals. It is accountability that medically trained naturopathic doctors are seeking for their healthcare field.
- 2) Specialized skill and training.** Medically trained naturopathic doctors are a distinct group of providers. We go through a rigorous, and yet, fundamentally distinct type of training; skills we acquire are unique compared to lay naturopaths and other medical providers. As you are aware, naturopathic doctors complete a four-year onsite medical program, and complete board exams in basic sciences. We also take licensing exams in pharmacology, nutrition, botanical therapies, and physical medicine. The crisis of chronic disease necessitates increased access to specialized professionals who have expertise in prevention. Naturopathic doctors are experts in their field related to natural therapies where they understand the interactions between pharmacotherapy, nutrition, and botanical medicine.

As a professor of pharmacy practice, I feel this is missing component in our healthcare system. Both conventional medicine and pharmacy has become increasingly complex with the advent of new medications and technologies. Since there is limited time within a conventional medical curriculum, it is very difficult to devote adequate time to incorporating complementary and alternative medicine (CAM). It has been my experience that CAM therapies are included as an afterthought after providing what is necessary for conventional medical training.

Studies have demonstrated that our patients are using CAM therapies and often times they fail to inform their healthcare providers of their use. Numerous reports

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naturopathic doctors, (also known as naturopathic physicians or naturopathic medical doctors –titles vary by state). Neither certification nor registration adequately distinguish between licensable, medically trained naturopathic doctors and lay naturopaths. There are no states that offer certification, and in the few states that register naturopathic doctors, the process in those states works like a licensing process, where only those who graduated from a CNME accredited naturopathic medicine program can call themselves naturopathic doctors. Unfortunately, the Virginia BHP registration process does not offer any objective, and does not distinguish between medically trained and lay naturopaths, which is one of the primary purposes of licensure in all of the states and territories that currently regulate naturopathic doctors.

Licensing medically trained naturopathic doctors will provide additional, safe healthcare access for the Commonwealth. Once again, I thank you for your time and effort in producing your report. I respectfully urge the Board to recommend licensure.

Thank you for your consideration,

Richard S. Nicholas

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have documented the poor quality of botanical and nutritional products, and scientific evidence is lacking on some CAM therapies. Medically trained naturopaths are educated on evidence-based CAM practices and remain the conscience of the botanical and nutritional supplement industries.

- 3) Autonomous practice.** Naturopathic doctors practice independently in all twenty-five regulated U.S. jurisdictions, and practice in collaboration with their patients' collective care teams.
- 4) Scope of practice.** Naturopathic doctors are trained as primary care providers, and their scope should reflect such training. In this critical time of provider shortages, Virginians need increased access to the full range of primary care and preventive services that medically trained naturopathic doctors are capable to provide. Naturopathic doctors could serve as an additional provider to help us deal with the crises we are having in serving those with pain, addiction, chronic disease, and mental health illness. They work collaboratively to serve as another safety net provider. With the current pandemic, resources are even more limited, and trained medical professionals are critical to our public health system.
- 5) Economic impact.** Licensing will increase the number of naturopathic doctors in Virginia, thereby increasing patient access and reducing costs. The closest localities that license naturopathic doctors include Maryland and the District of Columbia; naturopathic doctors wishing to practice more fully to the scope of their training, and Virginians seeking this holistic access to naturopathic medicine, are being driven to put their financial resources (and pay taxes) into bordering jurisdictions. Additionally, licensing is the first step towards some level of insurance coverage for patients. Presently, naturopathic doctors are not allowed to use coding such that patients would be able to submit their visit to insurance for coverage, even as a superbill. Without ability to obtain insurance coverage, many Virginians -- including those most in need and lacking available care -- are unable to access the preventative medical services that naturopathic doctors are so well positioned to be able to provide.
- 6) Alternatives to regulation.** Without regulation, citizens who are harmed by naturopathic doctors do not have adequate redress. Currently, they can contact the Better Business Bureau, file a complaint with the Attorney General, or file a lawsuit. These alternatives are not adequate to protect Virginians from potential harm or abuse, as there is no ability to suspend or revoke licensing or credentials and have that information available to the public.
- 7) Least restrictive regulation.** Licensing is the appropriate level of regulation for medically trained health care professionals. Of the twenty-five (25) U.S. jurisdictions that regulate naturopathic doctors, twenty-two (22) of them [license](#)

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On Mon, Aug 17, 2020 at 4:19 PM Leah Tweel <[lunapulina@gmail.com](mailto:lunapulina@gmail.com)> wrote:  
August 17, 2020

Dear Members of the Committee,

My name is Leah Tweel, I have been a Virginia resident for nearly nine years and I have been under the care of a naturopathic doctor for over six years. I am writing in support of a recommendation for licensure for medically-trained naturopathic doctors.

The impact of having naturopathic support throughout the past years on my multiple sclerosis journey has been invaluable. The resources and support that have been provided to me via naturopathic care has freed me to feel more empowered in my life as a parent, partner and contributing community member. I have far more options on how to help manage my physical and mental welfare and can rely on my provider and their staff for support on an as-needed basis with the confidence that they are working alongside me to identify the most relevant and recent science and therapies related to my situation. I know they desire the best possible outcomes for me physically, mentally and socially.

As a patient who supports licensure for medically-trained naturopathic doctors, here are a few concerns I have as it relates to the below criteria.

- 1) Risk of harm.** I want to be able to refer my friends and family in Virginia to naturopathic providers with the confidence they will receive consistent and qualified level of care. Some traditional naturopaths call themselves "naturopathic doctors", but never went to medical school. The public generally does not know the difference between these two types of providers. Many patients move to Virginia from licensed states, where they had been able to safely access care from a medically-trained naturopathic doctors. A problem lies in the fact that many of these same patients - who expect the same level of regulation in Virginia as their prior residence - end up under the care of a traditional naturopath who has no medical training.
- 2) Specialized skills.** I trust the broad expertise of my naturopathic doctor and am regularly amazed at the breadth of her knowledge. Naturopathic doctors are the only medical providers specifically trained in drug-herb and drug-nutrient interactions. As they are both extensively trained in both conventional approaches and natural medicine, they help bridge the gap that exists between conventional and traditional medicine practice.
- 3) Autonomous practice.** The reason I have hope in spite of my medical condition and feel supported by my medical team of providers is due **solely** to the fact that my naturopathic doctor has referred me to these specialists who have supported my physical and mental well being through physical therapy, lymphatic massage therapy, counselling and other modalities. Please note that at no point have my general practitioners or neurologist referred me to these above mentioned augmentative therapies which I would now be in pain and depression without. In fact, counselling has

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probably preserved and strengthened my marriage and my mindset when I felt there might be no other way to cope except to leave. I see my medically-trained naturopathic doctor specifically because other medical providers do not have the same training and knowledge in both conventional and natural medicine. I trust them to recommend outside specialists as they are needed.

**4.) Alternatives to regulation.** As a patient and a consumer, I want access to safe (regulated) and holistic (in scope) care that best aligns with my health needs and priorities. There are no alternatives to regulation, including stricter consumer protection laws or inspection requirements, that address the fundamental issue of allowing naturopathic doctors to have an expanded and defined scope of practice in Virginia. While some alternative options may consider the real risk of harm that exists, they will not appropriately examine or take into consideration the other criteria that warrant licensing for naturopathic doctors.

**I respectfully urge the Board to work to join the 22 states and the District of Columbia with naturopathic licensing and recommend licensure for naturopathic doctors in Virginia. Licensing medically-trained naturopathic doctors will provide additional, safe healthcare access and options for the patients who need it most.**

Sincerely and with thanks,

Leah Tweel  
Richmond, VA

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Similarly, other professionals in the medical field can be confident that NDs have meet appropriate standards and are competent to provide quality and safe care. Licensure can help foster interdisciplinary approaches for the betterment of patients and the community.

Thank you for your time.  
Dana Kleinschuster

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From: **Dana Kleinschuster** <[dkleinschuster@verizon.net](mailto:dkleinschuster@verizon.net)>  
Date: Tue, Aug 18, 2020 at 9:42 AM  
Subject: Written testimony for the support of ND  
To: <[elizabeth.carter@dhp.virginia.gov](mailto:elizabeth.carter@dhp.virginia.gov)>

Hello Dr. Carter,

I was scheduled to speak on August 11th in support of the licensing of NDs but had to leave the call because of time constraints. I am sending my testimony in written format.

Thank you,  
Dana Kleinschuster

Hello

My name is Dana Kleinschuster. I am a board certified pediatric nurse practitioner and have been practicing in the Richmond community for 25 years. I would like to speak in support for the licensure of naturopathic doctors.

As a pediatric nurse practitioner, my career not only focuses on diagnosis and treatment of a wide range of medical conditions in children but also includes preventative medicine. Compared to the few positions for NPs when I first graduated from school, there are now hundreds of nurse practitioners in the area. As we all know, today's medical system is overtaxed. Sometimes it is difficult to simply just get an appointment with a provider. I have personally witnessed how NPs have eased the overburdened medical system, allowed for better access to care, and helped to contain health care cost. In my opinion, licensed NDs will do the same...more people will be able to receive quality care in a timely manner. The regulations of licensure will establish minimal standards of practice so that the public can confidently choose a ND as a part of their health care team.

I have also seen over the 25 years of working how important preventative care is for children. Unfortunately, the time constraints in most medical offices limit providers' ability to fully educate and discuss all aspects of wellness with families. Patients want to learn, want to avoid chronic illness, and want live well. NDs have the training, knowledge, and skills to meet those needs and their focus is on preventive medicine. Naturopathic doctors attend a four-year, in residence, post-graduate medical programs. In addition to studying a standard medical curriculum, NDs complete four years of training in clinical nutrition, homeopathic medicine, botanical medicine, physical medicine, and counseling. This extensive training enables a scope of practice to include the treatment of all aspects of family health and wellness. Licensure will allow NDs to practice to the full extent of their training.

NDs do not replace traditional medicine but can offer a more robust approach to overall health. For example, my mother has breast cancer and has received wonderful care and treatment at a local hospital. She sought additional help from a ND to supplement and strengthen her body's ability to fight the cancer and heal from both the cancer and the treatments. The ND worked in conjunction with traditional medicine, not in opposition. The ND was able to spend focused time on a highly individualized plan that helped educate my mother, strengthen her body's ability to heal, and aid in the prevention of further illness.

Naturopathic medicine has a distinct place in the medical community. Licensure is a commonsense and tangible way to protect the community by regulating care and ensuring that providers meet educational standards and continuing education requirements. It also will clearly define to the public the expertise, education and scope of practice of NDs.

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From: admin [anma.org](mailto:admin@anma.org) <[admin@anma.org](mailto:admin@anma.org)>  
Sent: Monday, August 17, 2020 4:44 PM  
To: Laura Jackson <[laura.jackson@dhp.virginia.gov](mailto:laura.jackson@dhp.virginia.gov)>  
Subject: Written comment regarding naturopathic doctors from ANMA

## *American Naturopathic Medical Association*

### *40 Years of Dedicated Service*

August 14, 2020

Naturopathic Regulation Study Committee

Virginia Department of Health Professions

**RE: ANMA does not support the licensure of Naturopaths and we do not support the practice of "naturopathy" that includes minor surgery or prescription drugs**

Dear Dr. Carter and all study group members,

The American Naturopathic Medical Association represents the majority of naturopathic practitioners in the United States. Our members work under many titles depending on the educational level completed. They go to resident and online learning programs that operate legally in the states where they originate. These schools are not diploma mills. Such as Internation Institute of Original Medicine in VA. Many of our members are licensed MDs, DCs, DDSs, and RNs that offer naturopathic therapies in their health care practices. Many of our members take the ANMCB certification exam. This is a 4 hour proctored examination set up and in place for 40 years. Licensing 18 practitioners in the state of VA will not fill any gaps and practitioners currently offering low cost naturopathy in your state will suffer. ANMA represents 213 members in VA and we have been purposely left out of the regulation conversation.

You are being asked to consider licensing naturopathic physicians, a small splinter group of naturopaths that want to include minor surgery and drugs in the practice of naturopathy without going to medical school. Don't be fooled by the efforts of this dangerous group wanting to "get their foot in the door" and eventually practice "allopathic medicine" at expense of the citizens of the state of Virginia. This deceptive group has been before Virginia's legislature repeatedly since 2005 seeking the titles ND, NMD or Naturopathic Physician (basically whatever they can get) with

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medical rights. This year they come with hidden features such as their own definition of naturopathic medicine. A definition that was invented by AANP in order to monopolize a profession they don't practice. The general public defines naturopathy as natural and non-invasive never including the practice of allopathy. ANMA opposes this bill based on our belief that graduates from the four-year schools are no better trained than graduates from distance learning/resident naturopathic schools **and all practitioners of naturopathy should only be allowed to practice naturopathy**. Bastyr, National, Southwest and Boucher Institute in Canada are not recognized as REAL medical schools. Bastyr and National started as schools without labs. How can you be considered a medical school without a lab? After it was reported to USDE that National was selling degrees National was forced to admit to USDE that degrees from their school were sold, and they did not know how many or to whom. Those people are out there somewhere and they could come to the state of VA to get a license.

A history of this group will show in the State of Washington, naturopaths, who were once called "drugless practitioners" in 1987, have over the years, requested their legislature to allow them to use the term "physician". Also in the state of Washington through a "Formulary Council", buried within their legislation they now are allowed to prescribe Schedule III (heavy narcotics), and IV (codeine) medications, and perform Chelation, IV drips, and minor surgery including "malignant tumors". Through a "Formulary Council" Oregon naturopathic doctors now prescribe Lunesta, Viagra, Ambien and opioids. None of these medications have any place in a real naturopathic practice. In CA a licensed naturopathic doctor killed his patient with a turmeric IV. He still has his license! Tell me where the protection is, if the licensure law was not passed in CA that man would be in jail now. The only benefit or protection from this licensure bill will be for the 18 people practicing outside of the scope of naturopathy, **using therapies that have never been tested to see if they work or if they are safe. They come before you calling themselves cardiologists and oncologists, really???** This is awful. Parents think they are protecting their children by using a licensed naturopathic doctor, the license makes them think that it is the same as a going to a pediatrician just without drugs and their children end up dying on the way to the emergency room. They also order treatments from outside of the US without telling their patients. You should ask yourselves does the state of VA want to be a part of this? We can provide the proof for all of these facts provided to you here.

Licensure is actually the problem. Licensure makes these practitioners appear to be something they are not. **There is no naturopathic standard of practice or standard of title every state that licenses is different.** You don't see that in the practice of medicine. In the practice of medicine all the practitioners are held to the same standard, the same accrediting bodies, the same liability insurance and educational standards from one state to another. Members of the public almost never go in search of a naturopath that practices allopathy. They are looking for a natural way to stay healthy and avoid having to go to their family primary care doctor.

The cost to the citizens of Virginia for administration of such a board is **prohibitive and the benefit is non-existent**. In 2010 the Governor of CA recommended sunset for its naturopathic board due to high cost and **low turnout of licensees** and in fact a representative from NY told this group to stop bringing legislation because it is a waste of their time and taxpayer dollars. Bridgeport had to terminate their ND program due to lack of interest. The truth is getting out.

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Graduates are coming out and telling their stories about the lack of education provided and no oversight once in practice.

If you still believe that these practitioners went to naturopathic schools and they learned allopathy including surgery and pharmacology, chiropractic's including massage and manipulation, as well as psychiatry then you should license them as integrative doctors or physicians, that is the definition of what they claim to practice and leave naturopathy out of the conversation. This would keep the public safe and they would not be confused about the care that naturopaths provide.

I urge you to vote ***against the licensure of naturopathy*** and put an end to this madness.

Sincerely,

**Dr. Marcus Greene**

## ***Vote Against Licensing Naturopathy***

P.O. Box 96273 • Las Vegas, NV 89193 • Phone (702) 450-3477 Fax (702) 897 - 7140 [www.anma.org](http://www.anma.org)

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