



SUPPORT HB 13-1111

A Bill for an Act Regulating Naturopathic Doctors

Sponsored by Rep. Ginal, Hamner, Hullinghorst & Sen. Newell, Hill

Why Support the regulation of Naturopathic Doctors:

Naturopathic Doctors complete a four-year post-graduate clinical doctorate degree from one of eight U.S. and Canadian accredited naturopathic universities recognized by the U.S. Dept. of Education and have passed a national Naturopathic Medicine exam. Their education prepares them as experts in natural medicine, including the prevention, diagnosis, evaluation, and treatment through education, nutrition, naturopathic preparations, natural medicines and therapies. There are currently more than 150 Naturopathic Doctors practicing in Colorado (up from 20 in the 1990s) who would meet regulatory standards and criteria.

A regulatory framework will:

- Provide Coloradans **greater and informed access** to affordable high quality natural medicine and health care.
- Assist Coloradans who choose Naturopathic Medicine to **identify the qualifications, education and background** of anyone using the title Naturopathic Doctor.
- **Hold Naturopathic Doctors accountable** for their medical services and provides a process for patients to file complaints should harm or wrongdoing be suspected.
- **Require Naturopathic Doctors to obtain \$1 M of malpractice insurance** to provide their patients with legal recourse when needed.

What the bill does:

- **Creates a registration program** for those Naturopathic Doctors holding a four-year post-graduate clinical doctorate degree, with oversight by the Dept. Of Regulatory Agencies' Director of Occupations & Professions.
- Authorizes the Director to determine a **naturopathic formulary** that can be used in the practice of naturopathic medicine.
- Creates a **multi-disciplinary Advisory Committee** consisting of three Naturopathic Doctors, one pharmacist, one MD or DO, and two consumers.
- Establishes **grounds for disciplining** a registered Naturopathic Doctor and sets forth the methods and procedures for **disciplinary action**.
- Requires Naturopathic Doctors to maintain **professional liability insurance** and annually meet **continuing professional competencies**.
- Requires Naturopathic Doctors to **communicate and collaborate** with other health care providers to ensure that patients receive the highest quality care.
- Contains **amendments commensurate with discussions** with the Colorado Medical Society and health care groups, such as, chiropractors, physical therapists, Vitamin Cottage, and other natural health care practitioners.

For additional information on HB13-1111 please call:

Ellen Caruso 720-530-3034

Betsy Murray 303-478-1207

Corky Kyle 303-263-5422



FACTS ABOUT HB 13-1111 REGULATION OF NATUROPATHIC DOCTORS

- **HB 1111 concerns the regulation of Naturopathic Doctors**, defined as those who complete a doctoral level naturopathic medical program whose accreditation is recognized by the U.S. Department of Education.
- This bill will hold Naturopathic Doctors accountable and **protect the public** by giving them a process to check credentials and backgrounds as well as file complaints. \$1M of malpractice insurance will be required.
- **DORA found during its Sunrise Review published on Jan. 4, 2008** that, “Colorado citizens have been harmed at the hands of multiple practitioners” and that “the potential for future harm, as found across the nation, exists in Colorado.” Since the public is ill equipped to determine the credentials and qualifications of Naturopathic Doctors, DORA recommended that Colorado: *“Regulate those naturopathic practitioners whose practices / activities pose a risk of harming the public and require that competency be demonstrated to engage in regulated practice.”*
- **HB 1111 does not grant authority for Naturopathic Doctors to bill Medicare, Medicaid or commercial insurance nor to be included in the state’s Essential Health Benefit** under the Affordable Care Act.
- The provision of **alternative health care services by other complementary and alternative health care practitioners will remain unchanged and untouched** by this bill. HB 1111 does not put anyone out of business.
- Other alternative health care practitioners who are not Naturopathic Doctors may use the titles of **“Naturopath” and “Traditional Naturopath”** as well as well as other commonly used titles. The title of **“Naturopathic Doctor”** is reserved for those regulated under HB 1111.

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Changes made to HB 13-1111 based on collaborative discussions with the Colorado Medical Society, American Academy of Pediatrics, Colorado Chapter:

- 1) Naturopathic Doctors prohibited from treating children 0-2 years old; No other health profession has this prohibition.
- 2) Informed consent required recommending concurrent care with pediatric health care provider for ages 2-8 and an additional three hours of continued competency in pediatrics per year.
- 3) Registration with Director Model rather than Licensure with a Type I Board of peers.
- 4) Removal of prescription drugs from Naturopathic Formulary.
- 5) Removal of "Physician," "Naturopathic Medical Doctor" and "NMD" from acceptable titles.
- 7) Mandated referral to oncologist in case of cancer.
- 8) Encouragement of collaboration with MDs, DOs and other healthcare professionals.

Changes based on discussions with legislators and other organizations:

- 1) Language clarifying exclusion and definition of other Natural Healthcare Practitioners.
- 2) Removal of "traditional naturopath" and "naturopath" as protected titles.
- 3) Increased mandatory malpractice insurance.
- 4) Concurrence with DORA requests for clear differentiation between Naturopathic Doctor's scope of practice and other Natural Health Care Providers.
- 5) Clear disclosure required of a Naturopathic Doctor's credentials and recommendation that the patient have a relationship with a licensed physician.
- 6) Individuals with substantially equivalent education and training allowed to apply to be registered as a Naturopathic Doctor.
- 7) Nutritionists allowed to counsel consumers seeking general advice on health care products.

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WHAT MEDICAL DOCTORS AND NURSES ARE SAYING ABOUT HB 13-1111 - AN ACT TO REGULATE NATUROPATHIC DOCTORS

"We have two fine NDs in our community who fill a need for treatment modalities that we MDs are less comfortable and competent in providing. I hope further discussion will bring forth an acceptable licensing situation that will allow medically-trained Naturopathic Doctors to provide their valuable service as recognized health care providers in Colorado." - *Dr. Christine Ebert-Santos, MD, Frisco CO, member of CMS*

"Naturopathic Doctors are trained to treat and support wellness for patients. They are trained in wellness maintenance, nutrition, and disease prevention, which are key components if we are going to improve health and reduce health care cost. What they add to patient care is vital to the healthcare team." - *Susan West, RN, Director, University of Colorado Hospital, Clinical Excellence & Patient Safety*

"My experience with the naturopathic physicians I have worked with is that their education is superb and their experience in dealing with family practice is excellent. There needs to be recognition, regulation and competency standards for this level of Naturopathic Doctor." - *Dr. Michelle Hemingway, MD, Durango*

"It is time for the CMS to recognize the presence of skilled Naturopathic Doctors and to help them acquire a deserved and necessary legitimacy within the State of Colorado. As leaders of the medical community in Colorado, we should bring them under our wing and support their efforts in this legislation as it is the best and safest outcome for the citizens of Colorado." - *Dr. David Luce, MD, Boulder, member of CMS*

"I feel the Naturopathic Physician is well-qualified to be granted a license to practice medicine in the outpatient setting. ...the practitioners of naturopathic medicine have much to teach my MD colleagues as the therapeutic approach with an appreciation for the nutritional metabolic needs of the patient combined with a conventional treatment is optimal for the citizens of Colorado" - *Dr. Leonard A. Wisneski, MD, FACP, FACN, Clinical Instructor of Medicine, University of Colorado School of Medicine*

"Over the last 12 years I have gained considerable experience in co-managing patients with naturopathic doctors. On the whole, these mutual patient care encounters have been rewarding, professional and productive" - *Dr. Gretchen Frey, MD, Denver, member of CMS*

"As a medical educator I can personally attest to the quality of Naturopathic Education. I have personally met with administrators and faculty, attended classes and labs, observed clinical treatment sessions, and evaluated the educational curriculum...The education gives Naturopathic Doctors a thorough understanding of medicine and diseases many of us face with our patients, such as diabetes, heart disease, hypertension, obesity, toxicology, and fibromyalgia. - *Dr. Carl Lepisto, MD, Grand Junction, Delegate in the CMS House of Delegates*

"After two years, I can without a doubt state that my collaboration with Naturopathic Physicians has been more important to the progression of my own practice in medicine than any training that I have been part of since Medical School.- *Dr. Michael J. Mullin, MD, Ft. Collins, Medical Director, North Range Behavioral Health*

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Addition of Naturopathic Medicine Boosts CV Risk Reduction

Shelley Wood | Apr 29, 2013

TORONTO — The addition of naturopathic care on top of usual care significantly reduced the 10-year risk of cardiovascular disease among adults with an increased risk for CVD, a small randomized, controlled trial has found [1].

In the study, 10-year risk, based on the Framingham algorithm, was 7.74% among subjects randomized to the add-on naturopathic medicine approach over a 52-week period, as compared with 10.81% in the usual-care group ($p < 0.001$).

The study, led by naturopathic physician **Dr Dugald Seely** (Canadian College of Naturopathic Medicine, Toronto, ON) is published online today in *CMAJ*.

"Future investigation of the potential for complementary naturopathic care to support general practice in preventing chronic diseases, including cardiovascular disease, is warranted," the authors conclude.

Cardiologists who reviewed the study for *heartwire* acknowledged there can be resistance among members of their specialty toward complementary approaches.

Calling the study "very timely," **Dr Tracy Stevens** (St Luke's Health System, Kansas City, MO) pointed out that naturopathic physicians reinforce many of the same messages to patients that cardiologists are saying but typically spend more time with patients to individualize that message.

"We should all keep our minds open. We are all in this epidemic, which is only going to get worse, and we know that if there are means to encourage our patients to take ownership of their health, that's great. It's easy for us as cardiologists just to write a prescription, but it's hard work to do a lot of the other things that we are recommending. Just being open-minded to suggestions by a credible naturopathic healthcare provider is the key."

Likewise, **Dr Nathan Wong** (University of California, Irvine) told *heartwire*, "It is great to see these positive benefits on CVD risk resulting from naturopathic physicians counseling on lifestyle. The results are not surprising, given we know multiple lifestyle sessions as was used in this study can reduce cardiovascular risk factors and would be superior to the generally poor state of 'usual care.'"

Higher-Risk Subjects Sought for Study

Seely et al's study invited postal workers aged 25 to 65 in three Canadian cities to participate in the study. All invited subjects, at baseline screening, were found to have high total-/HDL-cholesterol ratios.

In all, 246 subjects were randomized to advice to follow up with their family physician or to family physician follow-up plus seven individualized counseling sessions with a naturopathic doctor (ranging in time from 30 minutes to one hour) focused on health promotion, nutritional medicine, or dietary supplementation. Body weight and waist circumference and lipid, blood-pressure, and fasting-glucose levels were all measured in both groups three times during the year of study. In the naturopathic group, therapies included specific dietary and lifestyle recommendations, plus prescription of natural health supplements including omega-3 fatty acids, soluble fiber, coenzyme Q10, and plant sterols.

Of the 207 subjects who concluded the study, those in the naturopathic group had CVD risk levels by Framingham that

were 3% lower than those in the usual-care group. Prevalence of metabolic syndrome was also lower in the naturopathic group (31.6% vs 48.5%, $p=0.002$).

To *heartwire*, Seely stressed that the naturopathic approach is not merely the prescription of supplements but a holistic and individualized approach.

"I agree we can't tease out what component is delivering what aspect of benefit there," he acknowledged. "There is really a health coaching element that goes into naturopathic care and a certain amount of time that patients spend with clinicians that really allows them to focus on the key lifestyle issues. . . . So not just supplementation, for sure, although some of the ones we used have evidence for use in and of themselves, and when combined with a lifestyle and dietary changes, then they can really add up to have a more pronounced impact."

Stevens commented: "We all have to be careful of the supplement hype that's out there, and this isn't just with naturopathic meds, it's from watching *Dr Oz* or from whatever company is trying to sell you their products, but that's not necessarily a reflection of naturopathic medicine."

What "makes sense with supplements," she added, is supplementing those a patient is deficient in, but not others. "I think the naturopathic doctors, those who are acknowledged as being trained from a naturopathic college, do have good credibility with recommendations."

Focused Counseling Key

Wong pointed out that the study supports a role for the kind of focused counseling studied in the trial. "It is likely similar results could be obtainable by a combination of counseling sessions by dietitians and exercise physiologists or nurse case managers, but such interventions should be compared with the naturopathic physician intervention that was used in this study."

Stevens made the point that people who seek out care from a naturopathic physician tend to be a group who are already more proactive about their health, so this approach may not work for everyone.

Asked about the skepticism some "Western" medicine physicians may feel toward complementary approaches, Seely stressed that the profession and its approaches are regulated. Also, he noted, naturopathic physicians are also trained in physiology and pharmacology and often know more about adverse reactions and interactions than cardiologists.

The relationship between Western-trained physicians and naturopathic practitioners "is a partnership to be supported, ideally, and it's the risk of that sort of gut reaction on the part of physicians saying to patients, 'Don't do anything complementary or naturopathic' that leads people to self-censure," or, worse, take steps without any guidance from a regulated health practitioner, Seely said.

Seely and colleagues also have a cost-effectiveness analysis pending publication; to *heartwire*, Seely noted that the approach tested in this study, "showed a dramatic impact" in terms of the societal cost savings.

References

1. Seely D, Szczurko O, Cooley K, et al. Naturopathic medicine for the prevention of cardiovascular disease: a randomized clinical trial. *CMAJ* 2013; DOI:10.1503/cmaj.120567. Available at: <http://www.cmaj.ca> .



Naturopathic Care Produces Cost Savings

- Vermont Automobile Dealers Association saved approximately \$1,500,000 in direct and indirect healthcare costs by using naturopathic wellness Interventions over a one-year period.¹
- Naturopathic Interventions yielded a total estimated net cost savings of approximately \$1000 per patient with low back pain.²
- A Blue Shield of Washington study found that utilizing NDs would reduce cost for chronic and stress related illness up to 40% and cut costs of specialist utilization by 30%.³
- A more recent comparison revealed a \$356 annual health cost savings for each user of Complementary and Alternative Medicine (CAM) when compared to CAM nonusers.⁴
- CAM users averaged \$1,420 less in annual health care expenditures than nonusers in patients with the heaviest disease burden.⁵
- Changes in lifestyle and stress reduction a major focus of naturopathic medicine could save the US \$10 billion annually in reduced coronary angioplasty procedures and coronary bypass operations alone, and insurance savings of almost \$30,000 per patient.⁵
- Corporate health management programs associated with prevention and wellness showed a 26% reduction in health care costs and a \$6 returned for every \$1 invested.⁶
- Median per-visit expenditures were \$39.00 for CAM care and \$74.40 for conventional outpatient care in Washington. The total expenditures per enrollee were \$2,589, of which only \$75 (2.9%) was spent on CAM⁶
- A systematic review of cost benefit analyses of CAM compared to conventional care revealed 42% of the published studies showed cost savings Meeting Growing Consumer Demand for Integrative Therapies.
- Survey results of over 2000 US households showed 67.6% of respondents used at least one CAM therapy in their lifetime.⁷

1. Am. J. Health Promot. 2000 Sep-Oct; 15(1):45-52.

2. Altern. Ther. Healt

3. Henry. 1995. King County Medical Blue Shield Phase I Final Report: Alternative Healthcare Project Steering Committee. August 5, 1995.

4. Lind, BK, Lafferty WE, Tyree We, Diehr, PK. 2010. Comparison of Health Care Expenditures Among Insured and Nonusers of CAM Medicine in Washington State: A Cost Minimization Analysis. J. of Alt. and Comp. Med. 16(4) 411-417.

5. Guarneri E, Horringan, BJ, Pechura, CM. 2010. The Efficacy and Cost-Effectiveness of Integrative Medicine: A Review of the Medical and Corporate Literature. Bravewell Collaborative Report. June, 2010.

6. Lafferty, WE, Patrick TT, Bellas, AS, Watts, CA, Lind, BK, Sherman, KJ, Cherkin DC, Grembowski, DE. 2006. Insurance Coverage and Subsequent Utilization fo CAM Medicine Providers. Amer. J. of Managed Care 12:397-404.

7. Annals of Internal Medicine. 135(4): 262-268



V. NATUROPATHIC MEDICINE EDUCATION

Examination Board Comparison

ND students must sit for and pass two board exams known as the Naturopathic Physicians Licensing Exam (NPLEX) before qualifying for licensure. The NPLEX Part I, biomedical science examination is equivalent to USMLE Step 1 and COMLEX Level 1. These are systems based exams taken upon successful completion of graduate level training in anatomy, physiology, biochemistry, genetics, microbiology, immunology and pathology. They are clinically oriented examinations requiring the synthesis of all basic sciences.

The NPLEX Part II is comparable to USMLE (Steps 2 and 3) and COMLEX (Level 2 and 3) with an emphasis on the knowledge needed to begin practice as a solo practitioner. NPLEX Part II is taken after graduation from a CNME approved naturopathic medical school. It is a case based exam requiring the synthesis and application of knowledge of the clinical sciences the Naturopathic Physicians must have in order to practice safely.

Naturopathic Doctor	Doctor of Osteopathy	Medical Doctor
	2 Years Didactic	
NPLEX Part 1	COMLEX Level 1	USMLE Step 1
Systems based exams testing graduate level training in anatomy, physiology, biochemistry, genetics, microbiology, immunology and pathology.		
2 Years Primary Care Clinicals	2 Years Specialty and Subspecialty Clinical Rotations	
NPLEX Part 2	COMLEX Level 2	USMLE Step 2
	Clinical Intern Year	
	COMLEX Level 3	USMLE Step 3
Case based exams with an emphasis on the knowledge required to begin practice as a solo practitioner.		

National College of Natural Medicine
Four-year Naturopathic Doctor Track
 UPDATED 9/21/2010

course#	THIRD YEAR FALL	Clinic	Lab	Lecture	Hours	Credits
BOT610	Botanical Materia Medica III			36.00	36.00	3.00
CLE709	Clinical Secondary Rotation	48.00			48.00	2.00
CLE709	Clinical Secondary Rotation	48.00			48.00	2.00
CLE716F	Clinic Lab Practicum	12.00			12.00	0.50
CLE717	Clinic Medicinary Practicum	24.00			24.00	1.00
CLE972A	Clinic Grand Rounds	24.00			24.00	1.00
CLS711	Clinic Synthesis II	12.00			12.00	0.50
CLS516	Pharmacology I			36.00	36.00	3.00
HOM610	Homeopathy III			36.00	36.00	3.00
NCB610	Natural Childbirth I			36.00	36.00	3.00
NOS613	Gynecology			36.00	36.00	3.00
NPH726	Business Marketing			12.00	12.00	1.00
NUT611	Nutrition II			36.00	36.00	3.00
PHM613	NMT/Orthopedic Synthesis II		36.00		36.00	1.50
		168.00	36.00	228.00	432.00	27.50
course#	THIRD YR WINTER	Clinic	Lab	Lecture	Hours	Credits
CLE709	Clinical Secondary Rotation	48.00			48.00	2.00
CLE709	Clinical Secondary Rotation	48.00			48.00	2.00
CLE716W	Clinic Lab Practicum	12.00			12.00	0.50
CLE972B	Clinic Grand Rounds	24.00			24.00	1.00
CLE932	GPA2-Primary Entrance Exam					
CLS526	Pharmacology II			36.00	36.00	3.00
HOM620	Homeopathy IV			36.00	36.00	3.00
NOS732	Gastroenterology			24.00	24.00	2.00
NUT622	Nutrition III			36.00	36.00	3.00
PHM621	Minor Surgery I with Lab		12.00	24.00	36.00	2.50
PHM623	NMT/Orthopedic Synthesis III		36.00		36.00	1.50
PSY611	Interviewing Techniques I		12.00	12.00	24.00	1.50
NPH727	Business Leadership			12.00	12.00	1.00
		132.00	60.00	180.00	372.00	23.00
course#	THIRD YR SPRING	Clinic	Lab	Lecture	Hours	Credits
CLE811	Clinical Primary Rotation	48.00			48.00	2.00
CLE811	Clinical Primary Rotation	48.00			48.00	2.00
CLE716S	Clinic Lab Practicum	12.00			12.00	0.50
CLE972C	Clinic Grand Rounds	24.00			24.00	1.00
CLS632	First Aid and Emergency Medicine			24.00	24.00	2.00
NOS615	Gynecology Lab*		24.00		24.00	1.00
NOS630	Cardiology			36.00	36.00	3.00
NOS632	Pediatrics			36.00	36.00	3.00
NPH610	Naturopathic Medical Phil Tutorial			18.00	18.00	1.50
NUT633	Nutrition IV			36.00	36.00	3.00
PHM631	Minor Surgery II with lab		12.00	24.00	36.00	2.50
PHM633	NMT/Orthopedic Synthesis IV		36.00		36.00	1.50
PHM710	IV Therapy with Lab*		18.00	12.00	30.00	1.75
		132.00	90.00	186.00	408.00	24.75
	THIRD YEAR TOTALS	432.00	186.00	594.00	1212.00	75.25

National College of Natural Medicine
Four-year Naturopathic Doctor Track
 UPDATED 9/21/2010

course#	FIRST YEAR FALL	Clinic	Lab	Lecture	Hours	Credits
BAS410	Musculoskeletal Anatomy I			24.00	24.00	2.00
BAS411	Anatomy Lab I		24.00		24.00	1.00
BAS412	Organ Systems A and P I			96.00	96.00	8.00
BAS417	Biochemistry			36.00	36.00	3.00
BAS417T	Biochemistry Tutorial		18.00		18.00	0.75
BAS418	Basic Science Clinical Correlate I		24.00		24.00	1.00
BAS434	Evidence Informed Practice			24.00	24.00	2.00
NPH410	Naturopathic Med History and Phil and Ther I			24.00	24.00	2.00
PHM416	Palpation I Lab		24.00		24.00	1.00
		0.00	90.00	204.00	294.00	20.75
course#	FIRST YEAR WINTER	Clinic	Lab	Lecture	Hours	Credits
BAS420	Musculoskeletal Anatomy II			24.00	24.00	2.00
BAS421	Anatomy Lab II		24.00		24.00	1.00
BAS422	Organ Systems A and P II			84.00	84.00	7.00
BAS427	Biochemistry II			36.00	36.00	3.00
BAS427T	Biochemistry Tutorial II		18.00		18.00	0.75
BAS428	Basic Science Clinical Correlate II		24.00		24.00	1.00
BAS440	Microbiology/Public Health I			36.00	36.00	3.00
NPH531	Medical Ethics			12.00	12.00	1.00
PHM426	Palpation II Lab		24.00		24.00	1.00
PSY421	Cultivation of the Practitioner I with Lab		18.00	12.00	30.00	1.75
		0.00	108.00	204.00	312.00	21.50
course#	FIRST YEAR SPRING	Clinic	Lab	Lecture	Hours	Credits
BAS432	Organ Systems A and P III			84.00	84.00	7.00
BAS414L	Medical Histology Lab		24.00		24.00	1.00
BAS437	Immunology			36.00	36.00	3.00
BAS438	Basic Science Clinical Correlate III		24.00		24.00	1.00
NPH510	Intro Chinese Medicine			36.00	36.00	3.00
CLE430	Introduction to Clinic	12.00			12.00	0.50
CLS512	Pathology I			36.00	36.00	3.00
NPH411	Naturopathic Retreat			18.00	18.00	1.50
PHM412	Hydrotherapy with Lab		24.00	12.00	36.00	2.00
PHM436	Biomechanics/Intro Orthopedics			24.00	24.00	2.00
BAS441	Microbiology/Public Health II			36.00	36.00	3.00
		12.00	72.00	282.00	366.00	27.00
	FIRST YEAR CREDIT TOTALS	12.00	270.00	690.00	972.00	69.25



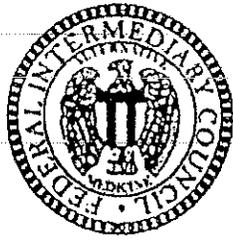
VI. NATUROPATHIC MEDICINE SCOPE OF PRACTICE

Scope of Practice for Licensed States

State	Year Licensure Enacted	Number of ND's	Primary Care	Prescriptive Authority	Imaging and Labs	Minor Office Procedures	Nutrition	Pharmacognosy
Alaska	1986	40	Yes	No	Yes	No	Yes	Yes
Arizona	1935	636	Yes	Yes	Yes	Yes	Yes	Yes
California	2005	398	Yes	Yes	Yes	Yes	Yes	Yes
Connecticut	1920	210	Yes	No	Yes	No	Yes	Yes
DC		16	Yes	Yes	Yes	Yes	Yes	Yes
Hawaii	1925	114	Yes	Yes	Yes	Yes	Yes	Yes
Idaho		30	Yes	Yes	Yes	Yes	Yes	Yes
Kansas	2003	17	Yes	Yes	Yes	No	Yes	Yes
Maine	1995	35	Yes	Yes	Yes	Yes	Yes	Yes
Minnesota	2009	35	Yes	Yes	Yes	Yes	Yes	Yes
Montana	1991	90	Yes	Yes	Yes	Yes	Yes	Yes
New Hampshire	1995	62	Yes	Yes	Yes	Yes	Yes	Yes
Oregon	1927	925	Yes	Yes	Yes	Yes	Yes	Yes
Puerto Rico			Yes	Yes	Yes	Yes	Yes	Yes
Utah	1997	41	Yes	Yes	Yes	Yes	Yes	Yes
Vermont	1995	190	Yes	Yes	Yes	Yes	Yes	Yes
Virgin Islands			Yes	Yes	Yes	Yes	Yes	Yes
Washington	1919	1025	Yes	Yes	Yes	Yes	Yes	Yes

INCREASE IN NUMBER OF NDs WITH REGULATION

STATE	Year Regulated	Number of NDs First Year of Regulation	Current Number of NDs
ALASKA	1986	5	56
ARIZONA	1935	UNKNOWN	715
CALIFORNIA	2003	129	584
CONNECTICUT	1920	UNKNOWN	252
DISTRICT OF COLUMBIA	2005	UNKNOWN	23
HAWAII	1925	UNKNOWN	103
IDAHO	2004	10	30
KANSAS	2003	5	21
MAINE	1995	7	33
MINNESOTA	2008	21	41
MONTANA	1991	14	82
NEW HAMPSHIRE	1994	11	72
NORTH DAKOTA	2011	4	10
OREGON	1927	20	870
UTAH	1997	0	33
VERMONT	1995	10	327
WASHINGTON	1919	17	1138
PUERTO RICO	2004	4	12



Federal Intermediary Council
on Alternative Medicine
OFFICE OF CERTIFICATION AND LICENSURE

Central Office - Denver:
900 Lincoln Street, Post Office Box 300808, Denver CO 80203-2799 (800)44-FICAM

Hereby awards this certificate
of recognition to the party named herein as having
satisfied all of the education, examination and experiential requirements
for the legal recognition and utilization
of the title:

Board Certified
Naturopathic Medical Doctor
(N.M.D.)

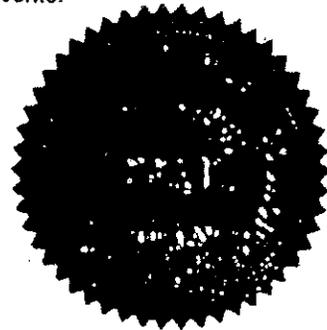
Awarded to:

To be granted all of
the rights and privileges pertaining thereunto.

Executed and Endorsed November 10, 2001

Certificate # 0111-1001NMD

W. B. ...
FICAM National Commissioner





"I strongly believe there should be recognition, regulation and competency standards for these Naturopathic Doctors. It is up to us to collaborate with these Naturopathic practitioners to continue to give our citizens the best and safest form of medical care."

-- Carl Lepisto, MD, Grand Junction

I am Carl Lepisto MD. I have practiced as a board certified ophthalmologist in Grand Junction for almost 40 years, since I completed my residency at the Colorado School of Medicine. I am the Past President of Mesa County Medical Society and am a delegate in the CMS House of Delegates. I am a lifetime member of the AMA. I was a Clinical Instructor on the faculty of the University of Colorado School of Medicine. I am board certified in the U.S., Australia, New Zealand, and Saudi Arabia where I was a member of medical school faculty, teaching and supervising medical residents.

One of the primary focus issues in medical care is for the public to have public safety and knowledge of the education and qualifications of their doctors. We as physicians need to become educated on what Naturopathic Medicine is and what are the education and qualifications of Naturopathic Doctors. Licensing Naturopathic Doctors will require four years education and experience in certified Naturopathic Medical Schools.

As a medical educator, I can personally attest to the quality of Naturopathic Education, I have personally met with administrators and faculty; attended classes and labs, observed clinical treatment sessions, and evaluated the educational curriculum at Bastyr University School of Naturopathic Medicine in Seattle, Washington. The first two years are devoted to basic sciences and clinical methods, with courses in anatomy, physiology, biochemistry, pathology, pharmacology, nutrition, and other aspects of preventive care. These studies are essentially identical in content to the curriculum of standard Medical Schools. The final two years are devoted to supervised clinical instruction in all aspects of patient care including neurology, family medicine, pediatrics, and naturopathic medical care. At Bastyr University, the clinical experience is a joint collaborative clinic with the University of Washington School of Medicine. The total hours of study are approximately 5000, which is essentially the same as my medical training. This amounts to 327 credit hours which compares to approximately 120 credit hours for most bachelors degrees.

Continued....

This education gives Naturopathic Doctors a thorough understanding of medicine and diseases many of us face with our patients, such as diabetes, heart disease, hypertension, obesity, toxicology, and fibromyalgia to name a few. Naturopathic Medical Practice focuses on the total health of the individual including physical, mental, emotional, and nutritional aspects.

The public is seeking naturopathic approaches as complimentary and alternative to the standard practice of Western Traditional Medicine. The University of Alabama in Birmingham in a recent study determined that there were more than 630 million visits to complimentary and alternative medical providers in a year. There are 120 graduate educated Naturopathic Doctors practicing in Colorado who are taking care of more than 100,000 patients. There are several integrative and collaborative clinics in existence in Colorado where Medical Doctors and Naturopathic Doctors work together cooperatively in caring for their patients. The Cancer Treatment Centers of America have both MD's and ND's on staff caring for patients. The ND's are not serving as oncologists, but are using natural therapies to care for patients undergoing cancer treatments.

Naturopathic Medicine has been caring for patients for many years in Colorado. The public deserves the right to know the qualifications and education of anyone calling themselves Naturopathic Doctors. DORA in a recent Sunrise Review stated that "A licensing scheme would offer the Public the greatest level of protection". DORA has been in favor of licensing Naturopathic Doctors for many years.

Naturopathic Medicine is not going away. And the need for medical practitioners is growing each day, especially with our aging population and the continuing implementation of the health care mandate. This will help improve the health of Americans and decrease health care costs.

I am suggesting that the Colorado Medical Society support the bill to license and regulate Naturopathic Doctors in Colorado. The Colorado Medical Society, Colorado Academy of Family Physicians, and Colorado Pediatrics have endorsed this practice in past years.

I strongly believe there should be recognition, regulation and competency standards for these Naturopathic Doctors. It is up to us to collaborate with these Naturopathic practitioners to continue to give our citizens the best and safest form of medical care.

Yours truly,

Carl Lepisto MD

**CONTACT: Ellen Caruso 720-530-3034; Betsy Murray 303-478-1207;
Corky Kyle 303-263-5422 Colorado Assn of Naturopathic Doctors**



North Range Behavioral Health

February 1, 2013

The Honorable Beth McCann
State Representative - District 8
Office Location: 200 East Colfax
Denver, CO 80203

Dear Representative McCann,

I am writing you in support of having Naturopathic Physicians licensed in the state of Colorado. Over the past two years, I have worked in a practice which includes two Naturopathic Physicians. I received my medical training at the University of California, San Diego. I am Board Certified in Adult Psychiatry and Board Certified in Child and Adolescent Psychiatry.

I can admit, that like most allopathic physicians, I was very hesitant with the prospects of engaging in patient care with "alternative" providers. After two years, I can without a doubt state that my collaboration with Naturopathic Physicians has been more important to the progression of my own practice in medicine, than any training that I have been part of since Medical School.

My work with Naturopathic Physicians has also opened my eyes to the dangers of having non-trained providers practicing "natural" or "alternative" medicine. It is in this light, that I hope that trained Naturopathic Physicians, from accredited schools, can be appropriately licensed in this state. Not only because I truly believe that they offer unique and viable treatments for patients, but to help prevent other providers from venturing into areas that are beyond their scope.

Sincerely Yours,

Michael J. Mullin, M.D.
Child, Adolescent and Adult Psychiatry
Medical Director
North Range Behavioral Health

From: Christine Ebert-Santos <drchrises@yahoo.com>
Subject: ND licensing...
Date: January 29, 2013 4:39:03 PM MST
To: Jan Kief <janmd@mac.com>
Cc: "susankoontz@cms.org" <susankoontz@cms.org>
Reply-To: Christine Ebert-Santos <drchrises@yahoo.com>

Dear Jan,

We didn't get a chance to talk about this last week when we were together, but I would like to share some of my experiences/concerns about the naturopathic licensing. We have two very fine NDs in our community who fill a need for treatment modalities that we as MDs are less comfortable and competent in providing. There are so many conditions for which I have no good treatment: diarrhea, colic, sleep issues, are examples. I respect the fact that these NDs graduated from a four year curriculum post college. They do not prescribe, conduct surgery, or have hospital privileges. Their training allows them to recognize conditions which need the attention of an MD and they readily refer patients to myself and others.

My concern is ensuring that NDs be recognized for their level of training. Separating the graduate trained professionals from the many other levels and layers of alternative medicine practitioners will raise the standard of care for all of Colorado . I appreciate your concern with regards to a Board being given freedom to set rules and determine a scope of practice which we, in our estimation may consider unsafe. I hope further discussion and analysis will bring forth an acceptable licensing situation that will allow the graduate-trained Naturopathic Doctors to provide their valuable service as recognized health care providers in Colorado .

Sincerely,
Christine Ebert-Santos, MD

TO: Rep. Chrisanta Duran

FROM: Mike Stratton

Chrisanta,

I am writing in support of the Naturopathic bill, HB 13-1111. Naturopathic medicine changed my life. My life was literally changed by having a Naturopath doctor work with me. Please support this legislation.

ND's need to be licensed for public safety, they fill a need in Colorado for the upcoming shortage of primary care providers, especially in rural areas.

Thanks for your interest in this important legislation.

-- Mike

w w w . h o l i s t i c p e d i a t r i c . c o m



February 11, 2013

Dr. Jan Kief
President CMS
9501 Sand Hill Court
Highlands Ranch, CO 80126

Dear Dr Kief,

I am a licensed Medical Doctor in Colorado and would like to support the licensure of Naturopathic Doctors who have completed a 4 year medical school program in Naturopathic Medicine. My experience with the naturopathic physicians I have worked with is that they are competent, capable, and can provide care for patients that our medical training does not adequately address. I often refer to an ND and we collaborate with patients frequently. In my collaboration I have come to appreciate their skills, training and differing approach to patient treatment. There needs to be recognition, regulation, and competency standards for this level of Naturopathic Doctors. There are many who call themselves "Naturopathic Doctors" who have not obtained a degree from an accredited medical school and who have not gone through the rigors of a 4 year program. The NDs who have received an online degree need to be distinguished from those who have an education commensurate with MD's and DO's as primary care physicians. Naturopathic Doctors are able to work with prevention and nutrition which are key components if we are going to improve the health of Americans and decrease health care costs. I wholly endorse the regulation and licensure of Board Certified Naturopathic Doctors in the state of Colorado.

Thank you for your consideration

Dr. Debby Hamilton, MD, MSPH



COLORADO ALTERNATIVE MEDICAL
REGULATORY BOARD

and
The Board of Examiners
900 Lincoln, Box 300708; Denver, CO 80203 (303) 616-5968

Hereby awards this certificate
of recognition to the party named herein as having
satisfied all of the education, examination and experiential requirements
for the legal recognition and utilization
of the title:

Board Certified
Naturopathic Medical Doctor
(N.M.D.)

Awarded

William C. Betzner

To be granted all of
the rights and privileges pertaining thereunto.

Executed and Endorsed September / 3 / 1998
mo day year

CERT. #RB0027

Sec/Treas.

Commissioner



**Federal Intermediary Council
on Alternative Medicine
OFFICE OF CERTIFICATION AND LICENSURE**

Central Office - Denver:
900 Lincoln Street, Post Office Box 300808, Denver CO 80203-2799 (866)44-FICAM

Hereby awards this certificate
of recognition to the party named herein as having
satisfied all of the education, examination and experiential requirements
for the legal recognition and utilization
of the title:

**Board Certified
Naturopathic Medical Doctor
(N.M.D.)**

Awarded to:

To be granted all of
the rights and privileges pertaining thereunto.

Executed and Endorsed November 10, 2001

Certificate # 0111-1001NMD

W. Butcher, P.D., N.M.D.
FICAM National Commissioner

