



September 17, 2018

Legislative Health & Human Services Committee of the New Mexico Legislature
490 Old Santa Fe Trail
Santa Fe, NM 87501

RE: Support for Licensure of Naturopathic Doctors (NDs) in New Mexico

Dear Hon. Members of the Legislative Health & Human Services Committee:

The American Association of Naturopathic Physicians (AANP), the national professional association representing licensed Naturopathic Doctors (NDs), wholeheartedly supports licensure of NDs in New Mexico. There are many compelling reasons to license NDs:

- **Licensing NDs recognizes naturopathic medicine as a distinct health care profession** providing safe and effective care for all ages. NDs are medically-trained specialists in natural medicine, focusing on prevention and treatment of acute and chronic disease through optimal diet, healthy lifestyle, and the utilization of natural, non-toxic therapies. The practice of naturopathic medicine combines the wisdom of nature with the rigors of modern science and evidence-based research.
- **NDs are properly trained to diagnose and treat illness, and licensing NDs provides transparency for patients.** NDs eligible for licensure in the 23 jurisdictions that currently regulate NDs are graduates of four-year, full-time, in-residence, doctoral level programs that are accredited by the Council on Naturopathic Medical Education ([CNME](#)), an accrediting agency [recognized by the U.S. Department of Education](#).¹ Graduates must then sit for the Naturopathic Physicians Licensing Examination (NPLEX), passage of which is required to be eligible for licensure.² New Mexico patients who wish to avail themselves of the services of a Naturopathic Doctor should be assured that if a practitioner uses the “ND” designation, he or she possesses the credentials needed to competently diagnose and treat illness safely and effectively.
- **Regulation works well in 23 regulated jurisdictions.** NDs are regulated in 23 other states and territories – most recently Rhode Island, where Governor Gina Raimondo signed a bill into law in July 2017. Such regulation has protected public health since Washington state began licensing NDs in 1919 and Connecticut followed suit in 1920. The US Department of Labor defines naturopathic physicians in the same job family as other licensed health care providers, indicating that licensure is the correct regulatory framework

¹ For further information on accreditation by the U.S. Department of Education, see <http://www2.ed.gov/admins/finaid/accred/index.html>.

² Information regarding naturopathic regulatory authorities and continuing education requirements in regulated jurisdictions may be found on the Federation of Naturopathic Medicine Regulatory Authorities (FNMRA) website: <http://www.fnmra.org/ras>.

for Naturopathic Doctors.³ Accordingly, NDs are licensed doctors in the overwhelming majority of the states that regulate NDs. They are “registered” in Colorado, Minnesota, and Pennsylvania, where registration functions similarly to licensure. NDs in Colorado are considered “licensees” by the Department of Regulatory Affairs (DORA), the board that regulates NDs. Because NDs are medical professionals who have attended accredited medical colleges and passed national exams, licensure is the appropriate level of recognition for Naturopathic Doctors, and it provides a legal framework for NDs to practice medicine in accordance with their training, skills, and expertise.

- **NDs focus on prevention and advance patient wellness.** Licensure of NDs in NM will increase patient access to naturopathic health care that is, in the words of the U.S. Senate, “[safe, effective, and affordable](#).”⁴ NDs are experts in natural, integrative, patient-centered health care with the express purpose of keeping people well. According to the US Centers for Disease Control and Prevention, 86% of the nation’s \$2.7 trillion in annual health care expenditures are for people with chronic and mental health conditions.⁵ Many chronic conditions such as obesity, diabetes, cardiovascular disease, chronic pain, anxiety, and depression are preventable, and health can be greatly improved through the kind of lifestyle changes typically recommended by NDs. Further, at a time when the opioid abuse epidemic is ravaging the country, New Mexico citizens would benefit from a licensed profession that offers non-invasive, non-toxic and non-addictive treatment for chronic pain. Naturopathic medicine is that profession.
- **Finally, naturopathic medicine is demonstrably safe.** Licensed NDs would bring an impressive record of safety to New Mexico. Seven of the jurisdictions that regulate Naturopathic Doctors report zero disciplinary actions in a recent five year period.⁶ In 2010, NCMIC, the largest malpractice insurer for the naturopathic medical profession, stated that it had never opened a claim based on an allegation against a Naturopathic Doctor involving prescription medications.⁷ Accordingly, malpractice insurance costs are low, with premiums for NDs nearly 5 times lower than for medical doctors.⁸

Licensing NDs will increase safe and effective health care options for New Mexicans; it will bring revenue and jobs into the state as more NDs and their families choose to call New Mexico home; and it will help address the shortage of health care providers by increasing the provider pool and expanding access to quality medical care throughout the state - especially in rural and underserved areas. Overall, licensure of NDs will protect all New Mexico citizens by ensuring the safe practice of naturopathic medicine in New Mexico. I would be glad to answer any questions you may have, and I can be reached directly at 202-849-6306. Thank you very much for your time and consideration.

Sincerely,



Laura Culberson Farr, Executive Director

³ National Center for O*NET Development. Naturopathic Physicians. 29-1199.04. Retrieved September 17, 2018, from <https://www.onetonline.org/link/details/29-1199.04>.

⁴ US Senate Resolution 420, agreed to unanimously Sep. 18, 2014.

⁵ <https://www.cdc.gov/chronicdisease/about/costs/index.htm>.

⁶ 2016 [Federation of Naturopathic Medicine Regulatory Authorities](#) survey.

⁷ NCMIC Letter to Jessica Curcio, ND, May 3, 2010.

⁸ NCMIC Letter to National University of Health Sciences, Jan. 26, 2017.