



From: mailagent@thesoftedge.com on behalf of Jaime Wright <mailagent@thesoftedge.com>
Sent: Wednesday, August 30, 2023 9:08 AM
To: ST, RegulatoryCounsel
Subject: [External] Comments on 16A-4953 - Naturopathic Doctors ANFR

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Dear Ms. Walter:

I appreciate the opportunity to comment on 16A-4593. After reading through the proposed rules from the PA Medical Board, I want to share my concerns with proposed language that is inconsistent with the language, spirit and intent of the Naturopathic Doctor Registration Act (NDRA), 63 P. S. §§ 272.101--272.301.

The proposed rules have included reference to "lay practitioners" in §18.907. Respectfully request that any inclusion of "lay practitioners" in rules applying to the NDRA be stricken. The language and intent of the NDRA is to ensure PA citizens who wish to avail themselves of the services of a Naturopathic Doctor, they can be confident a practitioner using the designation Naturopathic Doctor (ND), Registered Naturopathic Doctor (RND), or Doctor of Naturopathic Medicine (DNM), has achieved all of the education requirements defined in the NDRA. I applaud the requirement of passage of the competency examination administered by the North American Board of Naturopathic Examiners (NABNE), known widely as the Naturopathic Physician Licensing Exam (NPLEX).

Additional points of clarification and suggestions include::

§18.905(b), refers to registrants who have not had clinical contact with patients for four (4) years or more shall demonstrate passage of the NPLEX within 12 months of application.

Add clarifying language specific to passage of NPLEX Part II - Core Clinical Science Examination, the relevant assessment for reactivation of registration.

Please update the required hours in § 18.904(b)(5) and § 18.905(b)(6) to be consistent throughout with 23 Pa.C.S. § 6383(b)(3)(i) (relating to education and training).

Thank you again for the opportunity to provide comments and feedback.

Sincerely,

Jaime Wright
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