

How familiar are you with the applicants' proposal around expanding the naturopathic physician's scope of practice?	To what extent do you agree or disagree with the department's proposed recommendation?	Do you agree or disagree that the applicant's current proposal demonstrates that naturopathic programs have sufficient minimum education and training requirements.	Do you agree or disagree that the applicant's current proposal demonstrates inclusion of sufficient limits or safeguards like the other states where naturopathic physicians have prescriptive authority for controlled substances.	Do you agree or disagree that the applicant's proposed definition of "minor office procedures" is sufficient to evaluate training for these procedures.	Do you agree or disagree that the applicant's proposal demonstrates that the Board of Naturopathy includes providers with sufficient expertise to evaluate what additional education and training is needed to safely expand the naturopathic scope of practice.	Last Name:	First Name:	Middle Name: (If Applicable)	Who are you representing? (If Applicable)
Very familiar	Disagree	Agree	Agree	Neutral	Agree				
Very familiar	Agree	Agree	Disagree	Agree	Agree				
Very familiar	Agree	Disagree They definitely do NOT have sufficient education and training requirements. Every medication will interface not just with the target but also other organs. There's not a single drug that will only do the intended effect. Looking at any medication, you will see a long list of side effects that range across most organ systems. While in the best case scenario only the desired effect is achieved, what exactly is the point of having a prescriber to begin with if you can only work with the best case scenario? At that point, why not just make everything over the counter. I have no faith at all that the typical ND can deal with the varied potential for medical problems that will arise.	Disagree I find it frankly insulting that other states allow NDs to prescribe controlled substances at all. This is frankly so unsafe, and I would imagine disproportionately affect people who have low health literacy.	Disagree Totally agree with needing to understand what they mean by "minor office procedures". As an MD myself, I can technically also do surgery, have seen surgery being done, but it would be completely unsafe for me to perform surgery. And this is after going through so much medical training.	Disagree NDs evaluating NDs for a job that MDs do is so insulting I can't believe it is even proposed.				I am an MD, practicing psychiatry in WA
Very familiar	Agree	Disagree	Disagree	Disagree minor or major, naturopaths have zero training in any procedures	Disagree				my self as a MD
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Neutral There seem to be a variety of settings in which NDs can acquire additional training & those, I believe, should be encouraged.	Agree	Unsure	Agree In general, it feels like NDs need to prove their worth & legitimacy to conventional practitioners & the DOH. With the shortage of primary care physicians, &, frankly, the deteriorated quality of conventional health care & practitioners, it seems to me that the department should aggressively seek ways of supporting NDs to expand their legitimacy, training & opportunities. More of the public deserve to benefit from their proven holistic approach.				
Somewhat familiar	Neutral	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Kolan	Kathryn		
Very familiar	Disagree	Disagree Please do not allow expanded practice of NDs	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				Pediatric Physician (MD)
Very familiar									
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Kaur	Aneet		

		Naturopathic doctors have not studied allopathic medicine and it's effects on human body, they should not be allowed to practice allopathic medicine. It is frankly dangerous and a threat to patient safety. The eyes don't see what the mind doesn't know you cannot replace years of medical school training with naturopathic training. They need to stick to their naturopathic medications that they know about- which allopathic physicians do not know about							
Somewhat familiar	Disagree	Disagree Most naturopaths are NOT physicians. They did not go to medical school wherein physiology, biochemistry and pharmacology are studied in depth. A majority of naturopaths would not meet academic requirements to get into medical school.	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree They are unproven standards	Disagree	Disagree	Disagree They do not abide in current standards of care and present a potential harm to patients				
Very familiar	Neutral	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Vaughn	Michael	Scott	Self
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree There is not sufficient education.	Neutral There is not sufficient data and referral should be made to to specialist for OUD	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar									
Very familiar	Disagree	Agree	Agree	Agree	Agree Remember the code states that "It is the intent of this chapter that no regulation shall, after July 24, 1983, be imposed upon any health profession except for the exclusive purpose of protecting the public interest." Given that there is no evidence to suggest the contrary, it seems clear and prudent to approve the proposal, as rejecting it cannot be argues as being within the "purpose of protecting the public interest".	Rentz	Christopher		
Very familiar	Disagree	Agree In regards to adequate protection and adequate training, this scope of expansion should at the very least be considered for the NDs who have completed residency trainings. It's absolutely absurd that the ND's who completed two to three year residencies have less prescription authorities as primary care providers than ARNP/PA's.	Agree	Neutral	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				Self
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				I am a physician who regularly sees patients harmed

		Naturopaths expanding their scope of practice puts patients and communities at risk due to their lack of scientific knowledge and training and inability to understand their own knowledge limitations.			How can the blind teach the blind to see color? The board is composed of naturopaths who are not qualified to critically evaluate a naturopathy expansion in scope.					by naturopaths both directly through sham treatments and
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Agree	Disagree NDs do not have sufficient training, experience or expertise in the field to be able to prescribe, taper, or initiate opioids or Medication assisted therapies for OUD	Neutral	Neutral	Disagree	Grinshpun	German			
Somewhat familiar	Agree	Disagree The lack of education and proper training is highly concerning and the number of inappropriate procedures and prescriptions will increase dramatically if this is passed.	Disagree	Disagree The definition is too vague. There needs to be more specific oversight of what this entails to protect patients from errors or procedural complications.	Disagree	Benjamin	Edmonds			
Very familiar										
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					Physician in Washington state
Very familiar	Agree	Agree NDs attend a rigorous 4-year post graduate medical training to become licensed as primary care physicians in WA state and are highly valued by their patients for their comprehensive approach and extensive time spent in visits. Primary care doctors should be able to provide patients with needed medications.	Agree	Unsure NDs aren't trained to perform abortions or vasectomies and this should be left to specialists.	Agree					
Very familiar	Disagree	Agree	Agree When considering other providers with similar scope, PAs for example, the provisions are similar. There should not be more restrictions placed on NDs than there are for NPs or PAs.	Agree This has been already been an established scope of practice in the state for decades. There seem to be no major issues with its implementation. So why would there be concern now?	Unsure					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					I am a physician (MD)
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Very familiar	Disagree	Disagree Having compared the curricula and testing of allopathic and naturopathic medicine, it is clear that the standards of training and verification of minimal necessary education for naturopaths are insufficient for the applicant's proposal.	Neutral My disagreement with the DEA's money-based drug schedule classification system makes the issue of whether the applicant's current proposal includes sufficient safeguards and limitations for prescribing controlled substances irrelevant.	Disagree						
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Rubens	Brian	C		Self
Very familiar	Disagree	Agree	Unsure	Agree	Agree	Wagner	Laura			myself and my

		I find it astonishing that PAs and ARNPs have less training than NDs yet have a broader scope of practice. Also, I noticed that in this proposal ARNPs were not listed but DNPs were. DNPs are not ARNPs. DNPs are Nurse Practitioners (ARNP) who went on to get their doctorates to become DNPs, so you have not used the correct practitioner type or their education requirements for this document. It is clear that personal opinions and or department bias are present here and that this proposal does not reflect a fair and unbiased evaluation of the facts.	The guidelines and safeguards should be decided by the WA state's governing Board of Naturopathy once legislation makes it reasonable to do so. This entire sunrise review is about WA state and what is best for WA state residents. We are leaders in healthcare, and we don't need to look to states with less ND practitioners to decide what is best for WA state.	Yes, if a PA or an ARNP is able to train for any procedure, then NDs are educationally and clinically qualified to be trained in that same medical procedure.	The NDs on the Board know the current education requirements, and they are aware of what would be beneficial to add to educational and CEU requirements to ease the transition of expanded scope of prescriptive rights and minor office procedures. Since other practitioner types do not understand our training even when provided with clear transcripts and information about the teaching staff all having PhDs and being equivalent to MD educational training, it would be unwise to have other practitioner types on the board. Also, it is clear there is a bias in the Allopathic medical community in regards to Naturopathic Physicians and their training, so suggesting that the members of the Board of Naturopathy are not sufficiently educated to evaluate what training would need to be added is potentially destructive to my entire profession. Furthermore, the application demonstrates that NDs have more training in every way than ARNPs and PAs who currently have a broader scope.				profession
Very familiar	Agree	Agree	Agree	Agree	Agree	Thomas (testing)	Sherry		
Very familiar	Agree	Agree The proposal by the WA state Dept of Health reflects either personal opinion or inherent bias and lack of objective evaluation of the facts and information provided in the application. I recommend the WA State Auditor be asked to look at the application information and evaluate this proposal for accountability in regards to fairness and honest representation of the facts and information without bias. Furthermore, DNPs were referenced instead of ARNPs, and most ARNPs don't seek the terminal doctorate degree. Also, this proposal states several times that NDs are not trained in Pediatrics, Behavioral Health, or with other diverse populations. Again, these are misrepresentations of information that was included in the application. The reason MDs are not eligible for a license after four years of medical school is because at that point in their training, they have only observed clinical practice. They are required to choose a specialty for residency where their clinical hands-on training takes place. Only after one year of completed residency in any specialty is an MD eligible for any medical license, and they would be considered a GP or General Practitioner. ND students take shifts where they practice clinical skills literally interacting with patients as the clinical lead or secondary lead. We do our clinical training shifts concurrently with our Clinical Science classes. My MD colleagues who followed me on my shift shared with me that at UW their MD program required test scores of 50%and above as passing whereas Bastyr University requires test scores of 75%and above first year and 85% and above all the rest of the time. Education is emphasized in ND school because we take our principal of 'Docere' or 'Doctor as Teacher' very seriously, and our professors require us to be able to understand and explain concepts so thoroughly that we are able to communicate	Agree We aren't discussing other states where there are fewer practicing NDs than in WA state. We are discussing WA state and what is best for the people of WA. The Board of Naturopathy will delegate the parameters of educational and CEU requirements that are best for transitioning to a broader scope. The WANP is not the correct body to make those suggestions, and as this is their application, deferring to the regulatory body to implement and regulate those parameters is most appropriate for WA state.	Agree If a PA or ARNP can be trained to perform any minor office procedure, then Naturopathic Physicians, whose education and training are much more thorough and extensive, are prepared to be safely trained to perform any and all of those same minor office procedures.	Agree The NDs on the Board of Naturopathy are aware of the educational and CEU requirements for the profession. They are the most qualified group to evaluate and regulate what can be added to current educational and training requirements once the scope of practice is expanded by the WA state legislature. As there is significant bias in the Allopathic community regarding Naturopathic Physicians expanding their scope, it would be potentially very dangerous to the ND profession to have other types of practitioners on the Board of Naturopathy. The board does represent some community members as well. I believe this year the Board of Naturopathy's recommendation to add a community member was denied by the WA state Health Dept which sadly leaves that valuable seat for community member input vacant.	Wagner	Laura		Myself and my profession
Very familiar	Agree	Agree	Agree	Agree	Agree	Thomas (test 2)	Sherry		
Very familiar	Agree	Disagree Absence of relevant education and presence of deleterious education/training.	Disagree Other states should not be allowing it either.	Disagree Way too broad and undefined.	Disagree	Hodges	Kevin		ACEP
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Johnston	William	Todd	

		The training is inadequate to increase scope of practice		Not clear at all what the proposed procedures are so cannot adequately assess training	There is no outside medical board to corroborate the BON decision					
Very familiar	Agree	Disagree The application process to MD/DO school is fundamentally more competitive, rigorous, and selective of the brightest individuals vs. ND school. The ND students, and NDs I interact with regularly are definitely not competitive enough to get into a medical school from college and their understanding of basic sciences and medicine is weak to begin with. I would never trust a physical examination done by an ND. They don't have training to read X-rays, read and EKG, admit a patient, sign hospital orders, interpret an MRI or a CT scan.	Disagree NDs need far more supervision. They have no real training in managing patients with psychiatric disorders, yet they can prescribe antidepressants, anti-anxiety medications, etc. They have never worked in an inpatient or outpatient psych setting. I was once told by an ND who is an oncologist, that he manages cancer with prayer and herbs. This answer was unfathomable. This person teaches at Bastyr.	Disagree I am a surgeon and do minor office procedures. Removing a cyst may be a complex, multi-layer procedure that may involve critical motor or sensory nerves, vessels, and spaces. Where would a ND ever receive training to close a laceration? They don't work in and ER.	Disagree This is like asking if the fox should be regulating the hen house. NDs with inadequate medical training should NOT be regulating what additional education NDs may need. A person with an MD and an ND might be more appropriate and in a better position to comment.	Rubens	Brian			
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					myself, a physician
Very familiar	Agree	Disagree I agree with draft report. I do not think naturopaths have sufficient training to be dispensing narcotics. Also, they have not defined specifically what in-office procedures they want to do or are trained to do.	Disagree	Disagree What exactly are these minor office procedures that they wish to do?	Disagree	Shipowick	David	Glen		Myself. A board-certified physician in Washington state
Somewhat familiar	Disagree									
Somewhat familiar										
Very familiar	Disagree	Agree	Agree	Agree	Neutral					Naturopathic Doctor
Not familiar	Neutral	Neutral	Neutral							
Not familiar										
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
Not familiar	Unsure									
Not familiar	Agree	Agree Yes agree	Agree I agree	Agree Yes agree	Agree Yes agree	Mudimu	Judith	Dada		

Very familiar		Agree	Agree						
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Not familiar	Neutral								
Very familiar									
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Neutral			
Somewhat familiar	Agree	Unsure	Unsure	Agree	Disagree				
Very familiar	Agree	Disagree Naturopathic programs are significantly deficient in their scope of teaching and rigor that is required of those that meet the minimum education and training requirements. This lack of preparedness from the providers leaving the program unfortunately disproportionately effect those with lower or decreased health literacy that conflate the training of naturopaths and qualified healthcare professionals such as physicians, both osteopathic and allopathic.	Disagree Naturopathic physicians in Washington state have too much authority and power with a lack of safeguards and a third party governing body to hold those accountable for potential delays and mistakes and care.	Disagree The definitions and scope of these terms are too broad and allow these naturopathic practitioners too much leeway room to take advantage of those without the understanding or context at which this care is being delivered and with what evidence supports it.	Disagree				
Not familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree I know board certified physicians who went through extensive training in residency and should not be doing these. NDs who get a degree online have no business doing these.	Disagree			
Very familiar	Agree	Disagree	Neutral	Disagree	Disagree				Myself (Osteopathic)
Not familiar									
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree			
Not familiar									
Not familiar									
Very familiar	Agree	Disagree	Disagree	Neutral	Disagree	Bistrika	Evgeny		Myself
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				Psychiatrist
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				

		As was demonstrated in the public comments and in the discussion during the review earlier this year, naturopathic programs are not equivalent to allopathic, osteopathic, PA or ARNP programs in the education or exposure to the use of these medications for an ND to be able to safely prescribe and monitor their use.							
Somewhat familiar									
Very familiar									
Somewhat familiar	Agree	Disagree Naturopaths should have less scope of practice, not more. They have a demonstrated record of causing direct patient harm with recommendations outside of acceptable medical care.	Disagree	Disagree	Disagree This is a self created board. They follow no true standard of medical care.				
Not familiar									
Not familiar	Neutral	Neutral	Neutral	Neutral	Neutral				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Gleave	Julie		N/A
Very familiar	Agree	Disagree	Disagree In No uncertain terms should a Naturopathic physician be able to prescribe controlled substances, they do not have the appropriate training or extensive medical background to prescribe medications within this category. It is frightening that this would even be considered with their background and knowledge base!	Disagree Too Broad. I very much so disagree based on their educational background and training. Respectfully, If A Naturopathic Physician wanted a scope of practice that involves Prescribing Controlled Substances and the ability to do minor procedures, they should go back to school and become a MD or DO.	Disagree Completely Disagree!	Mattson	Rebecca		
Very familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Agree	Agree	Disagree	Agree				
Somewhat familiar									
Very familiar	Disagree	Agree	Agree	Agree	Agree	Lacey	Loree	A	
Very familiar	Agree	Agree	Agree	Agree	Agree	Marsh	Jessica		

Not familiar	Unsure	Unsure							
Somewhat familiar	Disagree	Unsure	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Neutral It depends on the condition in which naturopathic physician is treating. Everything can't be healed naturally, if it were that easy then everyone would be living longer, and there would be no need for any type of doctors really!	Disagree	Unsure	Agree				Self
Not familiar	Disagree	Disagree							
Not familiar									
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree ND do not have sufficient training to expand their scope of practice as described. They do not have the same training standards as MD or DO physicians.	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Neutral	Agree	Neutral	Neutral					
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Neutral	Unsure	Neutral	Disagree	Agree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Neutral	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				



Very familiar	Disagree	Disagree							
Somewhat familiar	Neutral	Neutral	Agree	Neutral	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Neutral	Kamanja	Peninah	Wanjiru	
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Mallahan	Michael		
Not familiar	Unsure	Unsure	Disagree	Disagree	Unsure				
Not familiar	Neutral	Agree	Agree	Neutral	Neutral				
Not familiar	Unsure	Neutral	Agree	Neutral	Agree				
Somewhat familiar	Agree	Unsure			Agree				Patient of Naturopathic
Not familiar	Neutral	Unsure	Neutral	Unsure	Disagree				
Very familiar									
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				Pharmacy
Somewhat familiar	Disagree	Disagree They do NOT have sufficient minimum education and training requirements	Disagree They are not sufficiently trained to prescribe controlled substances and isn't this against the naturopathic idea?	Disagree They do not have sufficient training for this and this will put burden on medical providers who are sufficiently trained as we will have to clean up their mishaps.	Disagree				
Somewhat familiar	Unsure	Agree							
Somewhat familiar		Disagree							
Somewhat familiar	Agree	Neutral I feel like it is potentially to black and white and that those docs interested in expansion, could earn post doc training and education showing proof of said training in order to receive the expansion.	Neutral	Disagree					
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree Worded very badly	Agree	Agree				Licensed Practical Nurses
	Agree	Agree	Agree	Disagree I don't think NDs have proper training to do surgical abortions or vasectomies. I think they could do abortions with medications though.	Agree				
Very familiar	Disagree	Agree	Disagree I am not a marijuana user and have never used it. Perhaps for some it is a good outcome, but I am biased against it.	Neutral The realm is too generalized to make a decision on.	Agree The Board of Naturopathy believes that they have knowledge to share which is denied to patients. They don't want to fail in entering this new advance in their physician's scope. They just have to make it right.	Wright	Dr. Jonathon		Tahoma Clinic
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Neutral	Neutral I think more training is always more beneficial.	Neutral	Neutral	Unsure				

Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree Naturopaths clearly don't have the training to prescribe opiates such as Suboxone. I as a FP Physician had to take additional training to prescribe Suboxone to treat difficult to manage patients with opioid addiction. It is not as simple as claimed!	Disagree	Disagree Minor office procedures can easily turn into a mess without sufficient training.	Disagree A neutral qualified third party needs to make that judgement. Not a biased group like the Board of Naturopathy. I have run into several Naturopaths who overestimated their skills to the danger of patients.				
Very familiar	Neutral	Agree	Agree	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree Naturopaths do NOT have sufficient training nor minimum education	Disagree Naturopaths do NOT have sufficient training nor minimum education. And doesn't this go against the naturopathic idea?	Disagree Naturopaths do NOT have sufficient training nor minimum education. This will burden the rest of the medical system as the providers who are trained to do this will have to fix their mess ups.	Disagree Naturopaths do NOT have sufficient training nor minimum education				
Very familiar	Unsure	Disagree Primary care is not about minimization of medications, but about appropriate risk stratification, quarterbacking/coordinating complex medical issues, etc. Equivocating what an IM/FM does to filling out forms and minimizing medications grossly understates the value of a primary care team. NDs have their role, but it is not the same as that of primary care providers.	Disagree We are already seeing inappropriate prescribing in this arena.	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree						
Somewhat familiar									
Somewhat familiar	Disagree	Disagree	Neutral	Neutral	Disagree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Neutral	Agree	Agree	Agree	Agree It just appears to be a trade-off to help the money makers, make money with murdering seniors children and giving out prescription mental health drugs, and I emphasize drugs in exchange for allowing a nature path to be a primary care physician. Nothing new under the sun. Human farming				Self
Very familiar	Agree	Disagree It sounds like they want to function as a physician with less training I suggest they go to medical school	Disagree	Disagree	Disagree				Myself as a critical care RN and LAC
Not familiar									
Somewhat familiar	Neutral	Neutral	Agree	Agree	Agree				
Somewhat familiar	Agree	Neutral	Neutral	Disagree	Agree				
Somewhat familiar	Agree	Disagree Naturopathic programs do not provide sufficient training in molecular biology, physiology, pharmacology, psycho-pharmacology, or any other relevant pre-medical knowledge of the human body to allow them to proscribe any medicine which is not available over the counter.	Disagree I do not support any increase prescribing rights for naturopaths, as their education explicitly rejects scientifically-based understanding of human health, and rejects standard of care treatments proven to be safe and effective. There are no sufficient limits or safeguards which can counter-act the fundamentals of the naturopathic philosophy, which prefers feelings over evidence.	Disagree Minor is relative to training and qualifications. A minor procedure from the perspective of a board certified orthopedic surgeon differs from that of a board certified dermatologist, and very much differs from a medical assistant phlebotomist.	Disagree I consider current naturopathic training, and the state of the naturopathic 'profession' to be equivalent to physician training prior to the Flexner report. That was 114 years ago. Except now it is worse, as their educational institutions are not simply incompetent, but actively reject the development of the medical sciences.				
Not familiar	Neutral	Neutral	Unsure	Unsure	Unsure				

Somewhat familiar	Disagree	Agree I agree that it demonstrates comparable education and training requirements with an acknowledgment that through continuing education there are actually more education and training focused on pharmacology than other provider types.	Agree The existing safeguards protect patients from providers who act outside of the scope of their practice.	Agree	Agree				
Not familiar	Agree	Agree	Agree	Agree	Neutral				
Not familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar									
Somewhat familiar	Agree	Agree	Neutral	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Not familiar	Unsure	Agree							
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Fernandez	Joseph		Myself, a pharmacist
Very familiar	Agree	Agree	Agree	Agree	Agree				
Not familiar	Disagree								
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree Their training and CE does not support the increase in scope. They have not proved to be beneficial the the treatment triangle and should not be allowed to prescribe life threatening medications with a sever lack of training.	Disagree	Disagree	Disagree	Holley	Richard		Pharmacist
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Neutral	Agree	Disagree						
Somewhat familiar	Agree	Agree							



Not familiar	Neutral	Disagree	Neutral	Agree	Agree					CNA
Not familiar	Unsure	Unsure	Unsure	Unsure	Unsure					
Not familiar	Neutral	Neutral	Neutral	Neutral	Neutral					
Very familiar	Disagree	People should have the right to choose for themselves. If less than satisfactory education is the issue.. make that publicly known & let people choose. People are free to smoke cigarettes, vape, and lots of other dangerous or u healthy behaviors.. HEALTH CARE SHOULD BE A CHOICE .. I DO NOT WANT OPTIONS REGULATED & THEREFORE REMOVED FROM THE OUBLICS RIGHTS TO CHOOSE.	That should NOT be the argument here. The argument should be DO PEOPLE HAVE THE RIGHT TO CHOOSE FOR THEMSELVES ? YES ! people most definitely should have that right .. the state should NOT take away that right.	Again.. I do not want the state to remove my right to choose for myself. If the state has concerns, they should just make it publicly known & allow people to choose.	This is a country, a society, based on free choice. I am free to destroy my health with a long list of legal, unhealthy, options available to the common consumer. I should also be allowed to choose who I wish to ask for help with my health. It's just that simple.					
Very familiar	Disagree	Agree The applicant report clearly demonstrates that Naturopathic physicians have more training than other prescribers when it comes to controlled substances, such as Nurse Practitioners. More hours of education, more hours of pharmacology. Nurse practitioners do not have residencies and receive very little training on pharmacology and yet are able to prescribe controlled substances with such limited education.	Neutral These safeguards will come from rule making from the Board of Naturopathy once the bill has passed on how prescribing will be handled. All the regular safeguards of safe prescribing, DEA regulations, and using Prescription Monitoring Program should all be in place. Board of Naturopathy will set limits on prescribing, and safeguards once bill is passed.	Agree	Agree The Board of Naturopathy is the governing body with sufficient education to evaluate what education and training is needed for Naturopathic physicians to effectively and safely prescribe controlled substances.	Richter	Teresa	E		
Not familiar	Unsure	Unsure	Neutral	Neutral	Neutral					
Not familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Agree	Disagree I do not think naturopaths have accurate education to expand their scope of practice as requested	Disagree There are not enough safeguards in the current recommendations	Disagree	Disagree					
Somewhat familiar	Neutral	Agree								
Very familiar	Disagree	Disagree They don't have the knowledge or education. I've had to fix their dangerous mistakes over the years	Disagree	Disagree	Disagree	Bowles	Rick	Kim		
Not familiar	Unsure	Neutral	Neutral	Unsure	Unsure					
Very familiar	Disagree	Disagree Very low level of prerequisites in order to fulfill admission to the Naturopathic doctor program as compared to MD. Please look at the prerequisites on a year to year and quality of coursework as compared to MD program. Ease of becoming a Naturopathic doctor will attract low quality candidates which will put a strain on the medical field in general. If Naturopathic doctors want access to Scheduled substances they should have to commit the same prerequisites, time in the and the same level of testing eg: USMLE. We must not fracture the medical field further, but raise it up and continually increase the difficulty to practice medicine to attract those who have the most passion and care to the profession.	Disagree	Disagree They should not be allowed to perform any such procedure without the same medical training as an MD	Disagree					
Very familiar	Agree	Agree	Disagree	Disagree	Agree					
Very familiar		Disagree	Disagree							

		There is nothing in the description of naturopathic education that at all suggests it would be appropriate to expand their scope of practice to include procedures and prescribing controlled substances. Where are the hours of training? Where is the risk awareness and prevention? Where is the testing? 4 years of post grad education cannot compare to professional school, what an inappropriate proposal.	What safeguards? How can you justify this proposal when these practitioners barely have any training? If you want to take on the risk of procedures going wrong or people getting hurt with controlled medications then you need clinical training, and hours of it, and that simply is not present. Where is the training coming from, and from whom?						
Not familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Not familiar									
Very familiar	Agree	Disagree Naturopathic practitioners have insufficient education to practice medicine and prescribe medication. The department makes a clear case against the applicant and it would be irresponsible to patients across Washington to allow naturopathic practitioners more medical powers for the sake of alleviating the burden on the healthcare system or any of the justifications provided by the applicant. You simply cannot have healthcare providers who do not know what they are doing.	Disagree I do not believe that the other states have sufficient limits or safeguards either.	Disagree	Disagree No, I don't think the Board of Naturopathy has the knowledge base or organizational maturity to safely expand the naturopathic scope of practice. Most importantly for me, naturopathic practitioners cannot be given prescribing powers because they are under-educated in medicine (which is simply "the science or practice of the diagnosis, treatment, and prevention of disease"), and instead spend much of their time learning pseudo-sciences instead. I am not against these methods that I disparage as pseudo-sciences and I often partake of them myself, but when they are touted as medicine that will treat disease, a line must be drawn. The department has demonstrably proven that naturopathic education has insufficient exposure to "traditional" medicine. If this proposal passes, naturopathic practitioners will be given the power to start prescribing medications that they have never heard of, meant for diseases they have never heard of much less understand or have previous patient experiences with, especially given the abysmal clinical hours they have. Addiction is very much a biological disease with strong behavioral and psychological impacts. People with addictions deserve to have providers who understand the drugs being provided to them. These drugs can have serious side effects if given improperly and can kill in the worst-case scenarios. Do not let the pull of needing more providers and the appearance of addiction as a behavioral struggle convince you that naturopathic practitioners are a solution to the provider shortage. They simply do not have the medical training to prescribe medications.				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree							
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Murdoch	Miriam		Myself

				Years ago, My former naturopath physician removed a sebaceous cyst on my husband's neck when we were in for a pregnancy consultation, because he could. He was the most compassionate doctor I have ever known! One of the founders of Bastyr!!					
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Neutral	Edmison	Sue		Self
Somewhat familiar	Neutral	Disagree The content of a naturopathic education is a 4 year degree but lacks a residency. I would like to know more about their pharmacology training- is it fully equivalent to an MD or DO? Is it closer to an NP or PA's pharmacological education? I was unable to find out in a brief online search of naturopathic education programs. Please put the burden of proof on the naturopathic educators to show pharmacology education syllabi equivalent to at least NP/PA standards with licensure testing that measure competence levels at least with that of PA/NP level. Consider including pharmacists in this evaluation as well.	Disagree No- Schedule 2 drugs are serious business and are at high risk for abuses in prescribing. I do not support allowing any other health care providers to prescribe other than those who are now legally authorized to prescribe them.	Agree I do want their training evaluated and scrutinized, but "minor office procedures" does not sound comprehensive enough. More detail is needed.	Disagree If they'd like prescribing privileges, consider a partnership with a professional organization of pharmacists to determine adequate appropriate training, and bring their recommendations to the board jointly.				Myself- an allied health care provider.
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				NA
Not familiar									
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree They simply do not have the training or experience to do this safely without supervision. Scope should NOT be expanded.	Disagree Too broad and open to interpretation.	Disagree Expanding opioid scope should require the supervision of the boards that currently manage this skill. The board of naturopathy is not able to regulate this and is not served by people sufficiently trained to do so.				Physicians in Spokane MD/DO
Very familiar	Agree	Agree							
Very familiar	Agree	Disagree							
Somewhat familiar	Disagree	Neutral	Agree	Agree	Disagree				
Somewhat familiar									
Very familiar	Agree	Neutral	Disagree	Disagree	Disagree	Graham	Jeremy		Self, and speaking

		By DEFINITION, Naturopaths are educated in OTHER THAN orthodox, scientific biomedical diagnosis and treatment. They do not have the appropriate education to utilize these tools.	The naturopaths' proposal does NOT included supervision or even collaboration with a physician trained in competent prescribing.	The notion of "minor office procedures" is useful from a business-management sense, but CLINICALLY meaningless- and naturopaths have no training in (and it is demonstrated, no understanding of) managing the innumerable ways that a "minor" procedure can precipitate a major crisis in the hands of even the best-trained medical/surgical physicians.	A solid instance of: They don't know how much they don't know.				from a quarter-century of clinical work & teaching, with recurring hands-on experiences trying to care for damage-done by non-physicians			
Somewhat familiar												
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Webster	Michael					
Not familiar	Unsure	Unsure	Unsure	Unsure								
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree							
Not familiar	Disagree	Agree	Agree	Agree	Agree							
Somewhat familiar	Agree	Agree	Agree	Agree	Agree							
Somewhat familiar	Unsure	Agree	Agree	Agree	Agree							
Somewhat familiar	Disagree	Disagree	I trust ND as primary provider, much more than western medical doctors. Disagree	Disagree	Disagree							
Very familiar	Agree	Agree	Agree	Agree	Agree							
Not familiar	Unsure	Unsure										
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				EAMPS			
Somewhat familiar	Agree	Agree	Agree	Agree	Unsure							
Not familiar												
Very familiar	Disagree	Agree	I believe that the ND community DOES have sufficient education and training requirements to increase scope.	Agree	Yes, I believe that there are enough safeguards in place to have NDs increase scope including prescriptive authority for controlled substances.	Agree	Yes. There was false information that the opposing stance took, claiming that this would include vascemomies. That is NOT true. The scope expansion would allows to do minor office procedures as laid out in the text. I support the ND training and ability to do minor office procedures.	Agree	Yes. NDs have similar training hours and are experts in the field of primary care physicians.	Gustas	Elizabeth	
Somewhat familiar	Neutral	Disagree	Disagree	Disagree	Disagree							









Somewhat familiar	Disagree	Agree To be honest women are falling through the cracks in the healthcare system and we are not getting the healthcare we deserve. I am 44 years old and it wasn't until I started going to my naturopath that someone was able to figure out why I am having all the issues I was having and it's because of PCOS which regular drs could have figured out had they don't the proper testing. Naturopaths are thorough and u actually get an hour appt if not longer when needed I will never go back to regular medicine unless needed. I don't want to have to take medicine and if I eat properly and take the right supplements my body heals.	Agree	Agree	Agree	Greenman	Melissa		
Not familiar									
Somewhat familiar									
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Agree	Unsure	Unsure	Agree				
Not familiar	Agree								
Somewhat familiar	Agree								
Not familiar	Unsure	Unsure	Unsure	Unsure	Unsure				
Very familiar	Neutral	Agree	Unsure	Neutral	Agree				Myself
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Althouse	Ralph		
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Morrisette	Kimberly		
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Neutral	Neutral	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree	Hicks	Essie	Stouffer	Dreamspace Natural
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Neutral I would need to do more research.	Agree	Agree	Neutral				
Not familiar	Disagree	Disagree							
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Not familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree Naturopaths have wholly and profoundly insufficient training to safely and appropriately prescribe controlled substances. To allow them to do so will lead to many deaths in Washington. As an ACGME fellowship trained and ABMS board certified Pain Medicine specialist I am expert in this opinion.	Disagree Naturopaths have absolutely no business prescribing controlled substances. As an ACGME fellowship trained and ABMS board certified Pain Medicine specialist I am expert in this opinion.	Disagree This is a purposely vague definition intended to allow for scope of practice creep into areas Naturopaths have zero training for. Minor office procedures need to be strictly defined. Appropriate clinical and hospital training in these procedures then needs to be documented.	Disagree Clinical training of Naturopaths is completely insufficient to expand their scope of practice to controlled substances and nebulous "minor office procedures". This question is also very poorly written.				





Somewhat familiar	Disagree	Agree Most doctors have to look up situations on line, and are quick to prescribe pharm drugs but unwilling to prescribe natural remedies, naturopaths are more open and clearly can evaluate if pharm meds needed and control the rx	Agree	Agree Again so many doctors are unable to even do minimum care they pass it to the nurses	Agree	Bezenek	Lisa		Self
Very familiar	Disagree	Agree Yes, naturopathic physicians have sufficient education and training to start their practice safely. All clinicians must continue to be life-long learners and receive adequate continuing education to stay safe and effective with their care. Medicine is a rapidly evolving science and no clinician is relying solely on what they received from their initial training to practice their best today.	Agree Yes, naturopathic physicians are governed by the Board of Naturopathy, will access the PMP, and will reference prescribing guidelines provided by experts in their area of clinical pharmacology.	Agree	Agree	Cotner	Robert	Christopher	I am a practicing Naturopathic Physician in Washington
Not familiar	Unsure	Unsure							
Very familiar	Disagree	Agree Like other physicians, NDs also have a 4 year undergraduate degree, required education in the basic sciences, and attend a 4 year accredited medical training program. They precept, in a clinical environment, following other licensed Naturopathic doctors, DO's or MDs for the entirety of their 4 year doctoral education while also attending a rigorous accredited academic program.	Agree	Agree	Agree This survey is confusing in its wording. To clarify all of my answers if I miss understood the questions - I do agree that the Naturopathic scope should be expanded to include substances in schedules II-V of the Uniform Controlled Substances Act. They are a regulated body of health physicians in Washington state, with an established board.				
Somewhat familiar	Agree	Agree							
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Not familiar		Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				Myself
Not familiar	Agree								
Very familiar	Disagree	Disagree	Disagree They are supposed to only use natural substances. They should complete allopathic medical school if they want to prescribed medications that are not "natural."	Neutral	Disagree				MD physician and pharmacist
Not familiar									
Not familiar	Neutral	Agree	Neutral	Neutral	Neutral				
Very familiar	Agree	Disagree they are not trained for these requests	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				General public
Somewhat familiar	Agree								
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Agree	Neutral						

Somewhat familiar	Disagree	Disagree Not enough schooling or enough exposure via clinical hours to the effects of controlled substances on different groups	Disagree	Neutral	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Agree	Disagree	McLaren	Jeff		myself, Washington State
Very familiar	Disagree	Agree	Agree	Disagree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Disagree	Disagree I don't feel naturopaths have adequate education to prescribe. They often practice non-evidenced based care. They give conflicting information to other professions, like Registered Dietitians.	Disagree	Disagree	Disagree				
Somewhat familiar	Unsure	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Young	Julia		
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar									
Somewhat familiar	Disagree	Disagree Naturopathic providers do not have sufficient training in medical pharmacology. There is real potential for harm in granting them authority to prescribe schedule II-V drugs. My experience is working with patients who use naturopathic providers have shown many instances of being prescribed supplements that specifically are harmful with the scheduled drugs they are taking, demonstrating a lack of understanding and clinical knowledge of the medications, their benefits and their risks.	Disagree There are already too many providers who prescribe harmful controlled substances without clear boundaries and understanding of the risks. Adding another layer of lesser trained prescribers to the mix is a recipe for worsening drug abuse and misuse.	Disagree	Disagree It is a four year program, with very minimal health science prereqs. No training in medication management, relatively little clinical training. Patients have the potential to be harmed by naturopaths who don't know what they don't know--leading to delays in proper medical care.				
Very familiar	Agree	Agree	Agree I would rather trust a ND to an MD because they get to KNOW the patient in a much more comprehensive manner than a regular MD usually would.	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree NDs are an essential part of WA healthcare services and amidst this shortage/crisis, their scope of practice must be supported and expanded. Please. Thank you.				
Somewhat familiar	Agree			Disagree					
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Stansbury	Jill	E	Self



		As a 35 year faculty member at an accredited naturopathic university, I am very familiar with the rigorous training program, the skills acquired in gynecology, pharmacology, non-pharmaceutical pain management and more giving graduates clinical competence suitable for performing abortions, treating OUD, and acting as PCP in many of the areas proposed in this Sunrise document.	Even though the profession of Naturopathic Medicine focuses on offering alternatives to drug therapies and offers many skills and therapies that improve health at such a foundational level that some drugs are no longer needed, the reality is that Naturopathic Physicians work extensively with patient populations on extensive lists of pharmaceuticals. Such physicians are already called upon to manage complex cases, be wary of drug interactions, screen for nutritional deficiencies causes by drugs, or guard against osseous, renal, and hepatic injury that many pharmaceuticals may cause. Such physicians are already weaning people from pharmaceuticals, managing the side affects of controlled substances, and help reduce harm from these agents. Improving the prescriptive authority will improve the ease with which such tasks can be managed, improve patient access to care and burdens on the healthcare system, and streamline care for those patients who must see a variety of clinicians, or have long waits to access care.		The national and state conferences and options for continuing education for Naturopathic Physicians is extensive, and the organizers are aware and responsive to the educational needs of its members. I have no doubt that these entities would offer additional training on demand and the schools would make adjustments to the curricula.					
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Sitko	Rollanda			
Very familiar										
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	frankel	jeffrey			Washington State Urology Society
Not familiar	Neutral	Agree	Agree	Agree	Agree					
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
		If naturopaths received sufficient education and training in medicine then they would realize that naturopathy is a pseudoscience and not actual medicine. Naturopaths should never be allowed to practice medicine. From the recommendations: "It is difficult to compare naturopathic educational programs to medical and nursing programs because the focus of the training is so different...However, the four-year naturopath training program also includes courses and treatment options in botanical medicine, exercise therapy, hydrotherapy, nature cure, acupuncture/traditional Chinese medicine, and homeopathy. This leaves less time and focus on pharmacology-related training and sciences.: Homeopathy and naturopathy are clear pseudoscience. If Washington needs more providers, then they need to look into how to resolve that with actual providers, not allow unqualified people to practice.	Washington needs to have a higher standard for medicine than what "other states" are doing.	Disagree	Disagree					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Hawkins	Richard	Scott	Myself	

		Naturopaths training is lacking in the basic knowledge to manage their proposal.	We have enough problems with controlled substances; we do not need more inadequately trained prescribers.	Where do they get their training? From unqualified.	The members of their board do not have the expertise or experience to undertake these activities. They are more interested in extending the interests of naturopaths than in protecting the public.				
Somewhat familiar									
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Neutral				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Agree	Unsure I am in third year medical student and so far we aren't trained jet to manage control substances	Agree We had training on sutures and minor surgical procedures.	Agree				
Very familiar	Disagree	Disagree Report makes allegations without citing evidence that expanding the scope of Naturopathic practice to include Opioid prescribing would improve patient care, cut down on ER visits, or fill the gap present by an insufficient number of MD's and DO's practicing in the state of Washington. We are currently fighting an epidemic of opiate abuse and expanding the authority to prescribe these substances would potentially and seriously compound the problem. Studies have shown that prescription opioid medications are at the top of the list as a source of opioids for those who use them inappropriately. There is insufficient evidence to suggest that the problem would not get worse if this proposal were to pass. Opioid and other scheduled medications are not Naturopathic in nature.	Disagree	Disagree There is no evidence that appropriate training is available to all ND graduates to perform these "minor office procedures".	Disagree The training of those who would be teaching these procedures is questionable.	Smith	Larry	Dean	NA
Somewhat familiar									
Somewhat familiar	Disagree	Disagree Naturopathic doctors do not have the medical training required to support such complex medical conditions and their scope of practice should be limited to their training. I do not believe they are qualified for these privileges.	Disagree	Disagree	Disagree				Myself
Somewhat familiar	Agree	Unsure	Unsure						
Very familiar	Agree	Unsure	Disagree	Disagree	Unsure				American College of Obstetricians
Not familiar	Neutral	Neutral	Neutral	Neutral	Neutral				
Not familiar	Neutral	Unsure	Unsure	Unsure					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Ly	Anh Tram		



Very familiar	Agree	Disagree ND training lacks many educational elements that a PC provider has to get trained in before they can be granted prescribing privileges.	Disagree	Disagree	Disagree I have been working closely with ND for many years, I appreciate their training in herbal medicine and nutraceuticals. As a FM trained physician, I do not think ND have enough supervised clinical expertise as part of their training to function as PC. Also, my basic question is: if our ND colleagues decided to go to ND training as they found conventional medicine not the "right path" to address patients' care needs; then why do they want to come back and function as a conventional trained provider?	Majd	Iman		
Somewhat familiar	Neutral	Neutral							
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Miller, ND	Julia		
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree If we allow naturopaths to broaden their scope, in spite of their lack of standardized training, oversight, and expertise we do so at the peril of our patients and communities. It matters not that other states allow naturopaths unreasonable scope; other states have outlawed masking, this is no reason to use them as examples.	Disagree	Disagree	Disagree				Myself, physician with over a decade in our communities
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Neutral	Disagree				
Not familiar	Neutral	Neutral	Neutral	Neutral	Neutral				
Somewhat familiar	Agree	Disagree	Disagree	Unsure	Disagree				
Not familiar									
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree pharmacology and understanding of drugs and interactions especially highly regulated schedule IV drugs is absolutely NOT in the scope of practice for a naturopath. This is dangerous to even consider.	Disagree	Disagree	Disagree	Boone	christopher		Surgeons MD
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				NA

		Most naturopathic training is done by other naturopaths, who themselves have inadequate training and experience in the problems and procedures of health professional practice.		ND trainees have inadequate training or supervised practice to make safe professional decisions about the need or appropriateness for office procedures or to perform the procedures safely.	Based on their ND education and post-graduate training, ND board members have inadequate experience with sick patients, multiple settings of care, other healthcare professionals, evidence-based practice, or BROTHER healthcare policy to guide the Board of Naturopathy.				
Somewhat familiar	Unsure	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Jeremy	Oulton		
Somewhat familiar	Neutral	Unsure I do not know what kind of schooling a naturopath goes through.	Unsure	Unsure	Agree				
Not familiar	Unsure	Agree Without some regulation, how do you differentiate between legitimate healthcare practice and quackery?	Disagree	Disagree	Unsure The Board of Naturopathy could be responsible enough. I don't know enough about their operations to determine that they ARE.				
Very familiar	Disagree	Agree Where there are potential lapses in education, the naturopathic educational foundation is strong enough that continuing education courses and certification programs can readily fill in any gaps.	Agree The DOH education argument in the report is dysfunctional circular reasoning. The concept that naturopathic educational colleges don't teach subjects that are illegal for naturopathic doctors to prescribe therefore, naturopathic doctors don't have safety information, therefore they should not be allowed controlled substance prescription authority is backward. Instead, because naturopathic education is foundationally very strong, the State should instead be insisting that naturopathic doctors have appropriate training and then be given the authority to prescribe these medications. Once the State has made it legal for naturopathic prescribers, naturopathic colleges will more aggressively teach the safe use of these medicines. It is entirely in the public's interest that naturopathic doctors, who have multiple treatment tools, be granted this authority to use these medications as an optional last resort. In contrast, medical doctors use these medications as a first and generally exclusive first resort. Naturopathic doctors are not the source of the opioid epidemic. Naturopathic doctors are the solution, as they advocate for natural alternatives and reduced utilization of controlled substances.	Agree	Agree Naturopathic doctors are the premier 'do no harm' doctors as they seek nontoxic treatments and rely very little on controlled substance prescriptions. It is my opinion that the DOH report mischaracterizes naturopathic education because, throughout naturopathic education the students are familiarized with multiple condition specific remedies which include herbal, homeopathic, nutritional, legend and controlled substances. Naturopathic education is not done in a vacuum where drugs are taboo and not discussed. Indeed, a naturopathic student is educated to be familiar with and to contrast and compare the benefits versus side effects of multiple treatment options. In fact, the DOH proposed report fails to show that the other comparative professions are not educated in the alternatives and are at a disadvantage to recommend and guide patients toward less toxic treatments.	Young	Thomas	J	Myself
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Golden	Robert		self
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Not familiar		Agree Reg MD's make plenty of mistakes and over treat patients and prescribe too many medications, especially benzodiazepines and pain meds, there are so many already addicted because, I knew a dr who continued to prescribed sleep meds even after the patient OD and ended up in the hospital.							
Very familiar	Agree	Agree	Agree						
Somewhat familiar									
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Neutral	Unsure	Disagree	Disagree				

		sufficient minimum education and training requirements for the current scope or proposed scope? If for the proposed scope than no and more CME is required from other sources (NOT ND sources).	I am an ND and honestly I have no idea. Arizona law is a train wreck with an ND doing a Brazilian butt lift so not sure Arizona is the state to compare with.	I do not even know how I found myself in this field. To read "minor office procedures" and to see the examples I am horrified. Surgical abortions and vasectomies are NOT minor office procedures. Removing a skin tag or a wart may qualify but I really have no words for this. It was awful to listen to this at the BON meeting and hear the responses by the MD's at that particular board meeting. I wanted to hide in a closet and pretend I did not hear what was being said by the WANP or the BON.	The BON is hamstrung by a number of providers that have no business being on the BON. How Luke (the assistant AG) can go along with some of the things that go on in that meeting I have no idea. I refuse to renew my ND license because I refuse to have to take 20 Continuing Education requirements from ND approved sources. For years I took my CME from UW, Virginia Mason, Swedish and other high quality providers. The BON has refused to believe a survey that we conducted demonstrating that very few ND's agree (single digit ND's agree) they then conducted their own survey which demonstrated the same results and they still refuse to change the Continuing Education Rules. I have quit going to BON meetings because it makes no sense unless you look at the finances of the AANP and the WANP. (Propublica tax info is interesting) The member numbers that were provided to the DOH- should be further looked at to see how many of those are student members. Every student at all 3 of the US schools pays ( with their student tuition money/which happens with AMSA also) a fee for membership into the student NMSA (comparable to the AMSA) and then selects which state organization they will belong to when the graduate. I suspect that the WANP has many many student members as most ND's that I know are not members because they are so frustrated about how the organization is run.					
Very familiar	Agree	Agree	Agree	Agree	Agree					Myself
Not familiar	Unsure	Unsure	Disagree	Disagree	Disagree					
Somewhat familiar	Agree	Disagree Naturopathic programs do not provide sufficient education to be able to safely treat our community as their proposal requests.	Disagree	Disagree	Disagree					
Not familiar	Neutral	Unsure	Agree							
Very familiar	Disagree	Agree								
Very familiar	Disagree	Agree Naturopathic physicians typically have more pharmaceutical training hours than osteopathic physicians	Agree Oregon and Arizona (states that also have naturopathic medical schools) have full access to all prescriptions including all controlled substances when the physician holds a valid DEA license	Neutral	Agree Highly agree, the seats for board positions are quite competitive and only the most qualified applicants obtain these positions.	Ash	Jennifer			My own patients and myself as a naturopathic physician
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Kathuria	Mona			
Somewhat familiar	Agree	Disagree Naturopathic programs do not have sufficient minimum education requirements for naturopathic providers to expand scope of practice.	Disagree Naturopathic programs do not have sufficient safeguards for naturopathic providers to prescribe controlled substances.	Disagree The designation "minor office procedures" is vague and cannot be sufficiently evaluated.	Disagree The Boards does not have sufficient expertise to evaluate the proposed expansion in scope of practice.					
Somewhat familiar	Agree	Disagree Naturopaths are not subjected to adequate education nor board certification or licensing knowledge exams to safely prescribe controlled medications.	Disagree	Disagree	Disagree					myself
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Attwood	Mary	Elizabeth Browne		Self/ND
Very familiar	Neutral	Agree	Agree	Agree	Agree					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Swift	Carrie			

		I do not think, based on the information provided that Naturopathic Doctors should have expanded practice approved.	I do not think that the ND proposal proves that they have sufficient training to safeguard WA residents	No I do not agree	The level of training is not adequate				
Very familiar	Agree	Disagree They do not have necessary training as measured against MD/DO training requirements.	Disagree Not sufficient.	Disagree These are not necessarily minor.	Disagree Again, they do not have the background or training to offer good, high quality, safe care without a substantially revised basic curriculum and practical training.	Sinanani	Mika	Narad	WSMA
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree The program comparisons section of the DOH report shows solid evidence of the lack of training that naturopathic programs provide. Would consider changing the residency section for MD category in post-graduate requirements to be a 3 year residency as this is actually the minimal number of years for general medicine requirement (internship +2 years for internal med/family med training). Please note that osteopathic physicians should be included in the category of MDs as we complete the same amount of training with the addition of OMT education and take the same licensing boards and residencies.	Disagree	Disagree	Disagree It is quite frustrating that physicians are required to complete years of postgraduate education, while APPs, NDs have hours or no requirements and yet they already have or are applying to expand their scope of practice to be equivalent to that of physicians. Yes there is a need for increased access to health care and primary care in Washington state and the US in general esp in rural areas but this does not justify expanding scope and providing unsafe and low quality of care for our patients. There is data already published demonstrating this for APPs with worse outcomes and higher costs in the long run: <a href="https://www.ama-assn.org/practice-management/scope-practice/3-year-study-nps-ed-worse-outcomes-higher-costs">https://www.ama-assn.org/practice-management/scope-practice/3-year-study-nps-ed-worse-outcomes-higher-costs</a> . How about increasing funding for our medical schools (esp osteopathic medical schools), decreasing medical student debt and adding incentives for choosing primary care and to practice in high need areas?	Zhang	Angela		Family medicine physician
Somewhat familiar	Disagree								
Somewhat familiar	Disagree	Disagree	Disagree						
Very familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree There is a fundamental reason why no academic center in the US houses a naturopathic medicine degree program. The rigors of US medical education (MD/DO), especially when it comes to controlled substances, is a critical pre-requisite when understanding health in the context of complex pathophysiology. Naturopathic training inherently focuses less on synthetic means of disease treatment and suppression, leading to lack of complex pathology and how drugs interact with eachother.	Disagree The applicant's proposed safe guards would not ensure that naturopathic providers have the skills to employ the use of controlled substances in complex healthcare scenarios where they are often required.	Disagree	Disagree				
Somewhat familiar	Unsure	Disagree Naturopathic providers have no fundamental understanding of pharmaceuticals within the realm of traditional allopathic medicine practice. As a former instructor at a naturopathic school, I taught coursework on the topic of emergency medicine. I can tell you with certainty that they have little or no instruction in the use of commercially made and regulated pharmaceuticals.	Disagree	Disagree	Disagree	Dieter	Mark	Lyndon	

Somewhat familiar	Neutral	Disagree	Neutral	Disagree	Agree	Okemah	Jennifer		
Somewhat familiar									
Not familiar									
Not familiar	Agree								
Not familiar		Disagree Do not give them an inch.							
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree Bastyr is in shambles and educators there have either quit or privately offered enormous concerns regarding training shortfalls. There is insufficient oversight or regulation of current training standards.	Disagree Missing are time limits for opioid prescriptions, required integrated clinical training experience over several years (not just coursework) and required mentored clinical hours with a healthcare team including allopathic medical providers (not exclusively NDs).	Disagree No mention of even minimal training for pregnancy termination. I am all for expanding access and training but with rigor and minimal clinical hours and proficiency standards.	Disagree Personally I have taken care of patients coming from ND practices who missed important diagnosis for years: MS, thyroid disease. They are too segregated (mistrustful?) from the specialist community and are slow to refer. I do not trust the Board of ND to self-regulate since there does not seem to be a culture of medical teamwork.				
Very familiar	Agree	Agree	Agree	Agree	Agree	Bradsher	Noah		
Very familiar	Unsure	Disagree Naturopaths supervise themselves. Their pharmacology training is limited. They prescribe homeopathic remedies that do not have clear evidence of effectiveness. They are not taught by pharmacists or allopathic/osteopathic physicians.	Disagree There are unclear limits or safeguards placed. We have struggled so hard to reduce opiate prescriptions and use. Expanding this to inadequately trained providers would be a huge step back.	Disagree There needs to be a specific list.	Disagree	DeeAnna	Maughan		N/a
Somewhat familiar	Agree	Disagree I absolutely disagree. Naturopathic programs do not have sufficient minimum education or training to prescribe most medications, especially controlled medications. I have seen how they cause harm with testosterone by not understanding the complexities of using that medication and by not being able to recognize or treat the complications.	Disagree	Disagree Minor office procedures is very broad and it is difficult to understand how their training prepares them if we don't know what they are? IUD? Biopsy? Joint injection? Also, one would need to evaluate if they are trained to discuss the risks and alternatives to these procedures, recognize and treat complications, and in the case of biopsies, interpret and treat the results.	Disagree				I am a physician.
Very familiar		Agree							
Not familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Not familiar									
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				



Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree I do not see any clinical training required beyond ND clinics during their didactic training. As a Board Certified Emergency Physician, I can attest that a majority of your training occurs during your residency years. Medical school didactic and clerkships help you learn about the practice of medicine. Residence training (referred to as "Post-Graduate Requirements in the Sunrise Review) helps you execute the practice of medicine under the watchful eye of attendings, senior residents and experienced nurses. There is no substitute to this training. I view residency as the "minimum ... training requirement."	Disagree The State of Washington Department of Health has made significant strides prescription of opioids and other controlled substances. Expanding the pool of practitioners that can prescribe these medications would be a step back. If the true issue is access to care, the solution lies elsewhere. Programs to recruit more appropriately trained allopathic and osteopathic physicians or PA-Cs would better serve our patients and community.	Disagree Even "minor" office procedures have high risk features. For example, when performing an incision and draining of an abscess, I routinely utilize ultrasound to ensure there are not any surrounding vascular structures that I could lacerate when performing my incision. Laceration of a superficial artery or vein could result in hemorrhage and further intervention. Additionally, there are certain areas of anatomy where superficial nerves could easily be damaged. Residency training is where you learn to mitigate the risk factors and gain the bedside experience to ensure a "minor office procedure" remains low risk.	Disagree This proposal is a step backward, is an inadequate, and potentially harmful. The real problem of access to care needs to be addressed through different means. Naturopathic practitioners should be viewed as an augment to primary care, a primary care specialist if you will, to address those issues of health currently not addressed by primary care practitioners with actual post-graduate training. NPs do not have the education, training or ongoing education to take the place of a board certified physician (allopathic or osteopathic), PA-C or even NP. Expanding their scope places our patients and communities at risk without fully addressing the underlying concern- increased access to care.	Weaver, DO MPH	Sean	Colin	
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Neutral	Unsure I'm a big believer in naturopathy because they find alternative methods of patient care	Neutral	Agree	Agree				myself
Somewhat familiar	Disagree	Agree ND have the same training as a MD until residence and should be able to be providers for insurance just as MD do.	Agree	Unsure	Agree	Minnis	Milo	fay	self
Somewhat familiar	Neutral	Disagree They should have more training							
Not familiar	Agree	Disagree	Disagree	Disagree					
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar		Agree							
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Momany	George		Myself
Very familiar	Disagree	Disagree one of their claims is to manage acute / chronic postop pain - this is not their job. They clearly do not have any type of surgical training, and acute postop pain is in the hands of the patient's SURGEON.	Disagree	Disagree What surgical training, what complications of what they do are they able to manage? Do no harm. Ive seen complications from well meaning, but clueless, NP's.	Disagree If they want to be doctors they need medical school. This filed of "health care" is not capable of what they are asking for.	Puig	Christine		myself
Very familiar	Agree								
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree							
Very familiar	Agree	Agree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Not familiar	Unsure	Unsure	Agree	Agree	Agree				
Somewhat familiar	Agree	Disagree	Disagree						



Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				Private citizen
Somewhat familiar	Agree	Disagree I completely disagree that naturopathic programs even come close to meeting minimum education and training requirements to be prescribing any kinds of controlled substances. Nothing in their training or practice will prepare them to prescribe adequately and be vigilant and aware of what to look for in terms of adverse effects in patients. Patients WILL MOST DEFINITELY BE HARMED by this.	Disagree I don't think any safeguards short of attending medical school and completing residency under the guidance of experienced attending physicians will be sufficient for any person to prescribe controlled substances.	Disagree Minor office procedures is so ill defined. What is a minor office procedure for a trained medical physician can be detrimental to patients if performed by others without proper training, experience and equipment. Being willing and being able are different things and patients deserve to be cared for by people who are wholly capable of handling whatever happens during a procedure.	Disagree The Board of Naturopathy may be qualified to handle naturopathic medicine. Allopathic medicine however is very different. This group of practitioners have long touted themselves as different and staying away from Western medicine. Why now are they suddenly interested in performing procedures that allopathic physicians perform. Why now are they trying to prescribe medicines that they have long derided as being bad for their patients. They have spent many years advocating against the use of allopathic medicine but are now trying to expand into this field without any regard for the years of training, testing and learning it takes to safely care for patient. There already exists a well established, well regulated pathway to performing procedures and prescribing controlled substances, it's called medical school. Let's not put patients safety at risk for convenience.				
Not familiar	Neutral								
Somewhat familiar	Agree	Disagree All practicing prescribing professionals should be required to do a formal, supervised residency to ensure additional competencies. Classroom education, non-standard clerkship rotations are not enough to ensure safe prescribing practices.	Disagree	Disagree	Disagree				Practicing physician in the community
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar									
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				I'm a licensed physician
Somewhat familiar	Agree	Disagree Unless there is concordance between USMLE/LMCC and board exam standards with ND exams, it seems completely absurd to allow naturopaths the ability to prescribe controlled substances or perform any in office procedures. Their clinical experience is profoundly different than MD/DO training and if their intent is to do the same things as these professionals, they should go through the same training. They should not be able to serve as primary care providers.	Disagree As a surgeon, what training by surgeons, do NDs receive - none, and therefore it would be completely negligent to allow them to perform procedures such as vasectomies or abortions.	Disagree See above. It is rare that family physicians do many office procedures anymore and they receive moderate training. As a general surgeon, the thought that a non trained naturopath could do a procedure that they are not trained to do, recognize benign from malignant, know what is truly "minor" etc etc makes me sick with worry for the public.	Disagree Parr Zoe				
Very familiar	Disagree	Disagree Naturopathic 'Doctors' are not medical professionals and should not be classified as such. This is dangerous at worse and wasteful at best for the public. Their practice is not built upon a foundation of peer-reviewed, rigorous science. This is snake oil. That naturopaths are now proposed to be able to prescribe medicines they have not studied during their online, informal, unmonitored, and unaccredited education is comical.	Disagree	Disagree They have no training in "minor office procedures" this is especially dangerous.	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				Primary provider



Somewhat familiar	Agree	Disagree The rigor, breadth, and depth of ND education and training is insufficient and incomparable to MD/DO training. ND should not be allowed similar scope to MD/DO's without passing the same licensing exams.	Disagree	Disagree	Disagree	Finkbonner	Jason		
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Agree								
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree All medical doctors, after 4 years of rigorous training, do an additional 3 year residency. This involves some many hours of training the states have had to enact laws capping the number of hours residents can work per week. This amount of training and exposure is needed because of the ever expanding complexity of medicine. ND training do not provide adequate training to meet needs of the public	Disagree	Disagree	Disagree	McDonnell	William	Michael	
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Groothuizen	Denise	R	
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Not familiar									
Not familiar	Neutral	Neutral	Agree	Disagree	Agree				
Somewhat familiar									
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				Public
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				Self
Somewhat familiar	Unsure	Disagree							
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Myung	Jane		Washington Academy of Eye
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Unsure	Disagree	Disagree	Unsure	Disagree				

Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree Naturopathic programs to do not have sufficient education and training to expand to these aspects. This is very unsafe.	Disagree Without adequate training, there is no safeguard possible to make this safe	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Agree I wish there were more Beds available for everyone!	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Unsure	Agree I'd rather be seen by a naturalpath. I don't want medication to be the first answer. I'd rather try a diet change or supplements, first.	Unsure	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Neutral	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Agree Oregon ND's have successfully managed the proposed expanded scope without patient harm while enhancing outcomes.	Agree	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				

		Naturopathic providers do not have the training or expertise that MD / DO providers have due to training.							
Very familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar									
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Pummer	Rachel		
Very familiar	Disagree	Agree I agree, based on the fact that other states do allow broad prescriptive rights for ND's who are trained at recognized naturopathic programs. Medical professionals of all types treat individuals who have received inappropriate care - this type of care is not limited to individuals who receive naturopathic care.	Disagree I believe the required pharmacology continuing education should be stronger/increased. I believe ND guidance in the form of continuing education is being restricted by the board of naturopaths and should be broadened to allow the doctors to select appropriate continued guidance for their practices and needs - and I do think that should include equivalent CEU to other prescribing mid-level practitioners like ARNPs and PAs.	Unsure Minor office procedures is in the licensure laws for NDs - taught to do a number of in office procedures like suturing and skin biopsy. Most individual practitioners would likely refer for these things. With regard to abortions - again - refer. Not sure what this is about for sunset purposes.	Disagree The board seems to be self selecting for people who are more on the fringe than ND training would suggest if optimal. They could use ARNP or PA help with regard to increased prescriptive authority.	Gonzales	Megan		myself
Not familiar	Neutral	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree Absolutely not enough training. Why would you expand scope in the midst of a national epidemic and give prescribing powers to a group that has less training than physicians? Even those proposal embarrasses me for Washington state.	Disagree	Disagree	Disagree				
Very familiar	Agree	Agree	Agree	Agree	Agree	Giles	Julianna		Myself
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				Individual practicing
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree Naturopathic training is in no way equivalent to Medical school/residency.	Disagree	Disagree They do not have sufficient surgical training. I am very concerned patients will be injured.	Disagree Again, they do not have the foundation of Medical School and residency.				
	Disagree	Agree	Agree						
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Dey	Atish		





Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				I am a pharmacist
		Naturopaths do not have training appropriate to becoming primary care providers. Post-graduation training such as residency is uncommon, not standardized, and frequently only lasts a year. Additionally, Naturopaths are not required to treat patients across a life span nor required to treat hospitalized patients. This continued scope creep of non-physician professions (PA, DNP, and now ND) will harm patients.		Primary care services should not be expanded to include naturopathic physicians. They do not have enough education or training to appropriately prescribe many medications. We should not be allowing yet another profession have expanded prescriptive authority. The addition of DNPs to being primary care providers and allowing them various specialties is a bad enough state of affairs.	Just because there is a primary care shortage in Washington State does not mean we should expand the scope of primary care to include undertrained and, ultimately, unqualified people. Scope creep is a serious threat to patient safety. These decisions to expand the scope of practice of undertrained professions will further drive physicians away from primary care and threaten jobs in other specialties. The true harm will not play out for many years and patients will suffer from greater amount of misdiagnosing and incorrect screening and medication prescribing. As a pharmacist, the difference in quality of prescriptions I see from a Physician (MD or DO) is vastly different from ND, DNP, and ARNP prescribing. The latter have the most dosing errors, inappropriate diagnoses for the med, and are the most uncooperative when prescribing errors are reported to them. Obviously, everyone makes errors but every pharmacist I know encounters far more issues with non-Physician prescribers. We should be focusing on problems with the insurance industry that keeps appropriately trained physicians out of primary care.				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				

Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree Naturopathic training is not sufficient to provide quality surgical and pharmaceutical care to patients.	Disagree	Disagree	Disagree	Ventgen	Pam		Alaska State Medical Association
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree I often answer questions regarding basic medications (lisinopril, B-blockers, abx) from local NDs. At times I end up saying, if you don't know the contraindications and complications, you should not be prescribing this medication.	Disagree Insufficient oversight.	Disagree Vasectomies are "minor" to whom?	Disagree				rural family medicine physician: me
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Not familiar	Unsure	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree Naturopaths should not prescribe controlled substances at any level nor should they perform 'minor office procedures' as they do not have the education and clinical training to do so.	Disagree	Disagree Naturopaths considered abortion and vasectomies as 'minor office procedures'. Again, they do not have the education and clinical training to safely perform any procedures, minor or not. Surgical training involves years of education and training in a hospital setting in a specific specialty. Please contact Catherine Hendricks (chendricks@facs.org) at the American College of Surgeons with any questions.	Neutral The Board of Naturopathy is well aware of the lack of education and training they and their licensees have and they are willing to put patient safety at risk.	Hendricks	Catherine		American College of Surgeons
Very familiar	Agree	Agree	Agree	Agree	Agree				Myself as a lifetime nursing

Very familiar	Disagree	Agree They have training AND impetus to limit use of opioids in a way that MD's do not.	Agree	Agree	Agree	Gren	Taunya		
Somewhat familiar	Agree	Unsure	Agree	Neutral	Agree The healthcare system is bad and a lot of people's health is getting worst and worst because of using many different drugs Which have very best side effect, and affect the body dramatically. Naturopathic medicine should use a better way to treat people. Yes, the training is Essential.				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				HCA
Somewhat familiar	Neutral	Disagree							
Somewhat familiar	Disagree	Agree I have had a naturopathic doctor for the last 15 years while also maintaining a primary care physician because there are certain medications my naturopathic doctor cannot prescribe. This means an extra visit, extra costs an extra travel time.	Agree My ND was a nurse before he trained at Bastyr to become a naturopathic physician. He has been providing care for several decades, and I consider him extremely well trained to monitor my health, and to advise me on medications and more natural treatments, which often are better suited to my needs. That said it would be better for me financially to have my ND prescribe the medications I need without having to make an extra visit to my primary care physician.	Agree I have visited my naturopathic doctor on several occasions for an intravenous treatment for migraines. He and his staff are extremely well trained to provide that type of service, and I believe would be more than capable of handling other minor procedures in the office.	Agree Naturopathic doctors, in my experience, are often better attuned to the needs of the patient, than primary care physicians. They are trained to see issues often overlooked by the primary care physician and it is in understanding these issues that the best care often emerges. I would not be here, but for my ND. I saw seven primary care physicians before my naturopathic doctor diagnosed my condition and helped me to recover from it. There is no reason to withhold authority for them to fully provide care that's necessary for their patients and is within the guidelines of practicing physicians	Johnson	Phyllis	Ann	Myself
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				WA-ACEP member
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				Health Care Authority
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree Naturopath's do not have extensive residency and fellowship training, which is the most valuable education component of an allopathic physician's training, which also accounts for thousands of hours of training. If you are unable to manage the complication of a drug or procedure, then you should not be able to prescribe the medication. In particular, in the current climate with the opioid crisis, it seems incredibly counterintuitive to expand the prescribing scope of opioids to a group that is grossly underqualified to manage it.	Agree	Disagree	Disagree Again, until there is extensive post-graduate, supervised training, with boards that monitor and maintain continuing medical education for specific fields of expertise, the training for naturopaths will be inadequate.				None
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Flores Rodarte	Jose	Carlos	Myself

		NDS do not do any kind of surgical training or surgical rotation. Being allowed to do "minor outpatient procedures" is unsafe when you don't have the training	NDS don't have sufficient pharmacology training to safely prescribe controlled substances. They learn non-science based homeopathy and about unproven plant treatments.	This is vague. Cyst removals/excisions? Skin biopsies? Punch biopsies? IUD placement or nexplanon placement/removals? vasectomies? Colposcopies? Also again - they have no training in any of those things so should not be doing them	Their training, while sometimes a helpful complement and alternative to science-based-medicine for those seeking this kind of care - is simply not the same as an MD's who went through 4 years of undergraduate education with a heavy emphasis on hard science that is required, 4 years of medical school, and 3+ years of residency in a variety of hospitals, clinics, and thousands of hours with patients. I do not believe their board understands how much less their training is compared to all that and how it does not prepare their graduates to be doing the exact same work as an MD					
Very familiar	Disagree	Disagree Our training for NDs is not sufficient for this expansion. The curriculum over the last 40 years tries to cover so many bases to make us "legal" in so many different areas that no one area is learned well (and sadly to take completely remove and take the place of some of our traditional classes like homeopathy, fasting, and hydrotherapy). How can we be good at all the modalities of naturopathic medicine and then add on the modalities of allopathic as well? This is especially true for the case of minor surgery and pharmacy and the many side effects and complications associated with them that we are certainly do not receive enough training that is found in a residency program. Graduating ND students do not receive enough experience to even practice- they learn enough to "not do harm" hopefully-- but not enough to be proficient in natural medicine. All graduating students desperately need residencies of 2 years minimum to gain experience (We can attest their skills are sub-par when we receive them for residency). We are called naturopaths- not medical doctors- we need to return to our roots and focus only on naturopathic medicine. If someone wants to work with medical treatments then they go to medical school, get the training in drugs and surgery and then add natural medicine to that. Sorry but this is a naturopathic doctor clearly against what the progressive naturopaths are trying to do to our profession. And a big NO for NDS prescribing opioids, hallucinogenic drugs, assisting in euthanasia or performing abortions! Also- NDs who practice within the scope of traditional naturopathic medicine DO NOT want to take the extra CE requirements and classes for this VERY SMALL group of progressive NDs who want to push our profession in another direction.	Disagree As a practitioner, I do not feel there will be enough education on how to use drugs- we do not have enough hours in pharmacy and we have zero hours as a resident working with the drugs and their side effects. This question is even posed in a way to make it look like naturopathic prescription in other states should be legitimized.	Disagree We do not have enough hours available in schooling to cover the necessity of the many hours of classes- We have zero hours of residency to practice these procedures. When I was in school thirty years ago they give a class and expect you to have a patient or two in clinic and then send you to the real world with the legal ability to practice minor surgery- it should not be the case without residency. This board needs to focus instead of expanding licensure- how to attain a 2-4 year residency for every since graduating student so they have the skills to even begin to compete with medical doctors.	Disagree The Board of Naturopathy, sadly to say, is comprised of urban "progressive" naturopaths from Seattle who have an ax to grind for their progressive policies including transforming the profession of naturopathy into a sub-standard medical profession-- trying to accumulate as many medical modalities (as in this bill) as possible so they can make as much money as possible with these therapies. (As the perfect example in Botox injections they have added to our medicine). In addition the other members are not physicians and only go along with the progressive members of the board. The Board really needs the opinions of small town doctors and traditional naturopaths to bring balance to this extremely progressive mentality that the Board has had for the last 10 years.					I represent the Heart and Soul of Naturopathy aka... The Nature Cure Docs...of "long ago". That which our medicine used to be before it was taken over by the progressive, allopathic-minded individuals today who are trying to destroy naturopathic medicine and turn it into some amalgamation of a "jack of all trades and master of none"... those folks who didn't get accepted into conventional medical schools so they are instead infiltrated into naturopathy to radically transform it into green allopathy. Its a sad sad day
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
Very familiar	Agree	Disagree I disagree that the applicant's current proposal demonstrates that ND programs meet sufficient minimum education and training requirements. I do not believe they have minimum education or training to meet requirements for their current level of practice in Washington state.	Disagree The proposal does not include sufficient limits or safeguards. Naturopaths should not be allowed to prescribe controlled substances and would only contribute to the current opiate epidemic.	Disagree Naturopathic programs do not include education or training for minor office procedures and allowing Naturopaths to perform office procedures without appropriate training and supervision places patient safety at risk.	Disagree					
Very familiar	Agree	Agree If the doctor feels that they may be deficient in an area where expertise is needed they have the intelligence to pursue a remedy for this deficiency.	Agree	Agree	Agree	Lehmann	Diane	C	myself	
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Davis	Christopher			

		Naturopaths most certainly do not have the minimum education and training requirements to expand their prescriptive authority to include controlled substances, nor do they have the competency and training to safely perform "minor office procedures".								
Somewhat familiar	Disagree	Agree The history of naturopathic medicine includes that they've been regulated since 1919, and the comparison table of education required for various professionals makes it clear that they have the education and experience.	Agree Yes. As stated, it's similar to the regulations in Oregon and Vermont. Washington and Oregon tend to do things very similarly in general already.	Agree	Agree They seem to have clearly researched comparisons in education, so I suspect they're able to check themselves and each other.	Kim	Mercedes			
Somewhat familiar										
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Disagree	Disagree I have first-hand experience with naturopaths inappropriately prescribing medications that are not controlled substances, but still dangerous nonetheless. If they don't have the training/education for this, they certainly may don't have it for controlled substances.	Disagree	Disagree	Disagree					
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Very familiar	Agree	Disagree Naturopaths don't have residencies or standards to learn to prescribe narcotics or do small office procedures. If they had 3-4 year residencies and board certification requirements I'd have no problems supporting their request.	Disagree	Disagree	Disagree	Katrina	Bassett			Washington State Dermatology Association
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Hobson	Clinton	J		
Somewhat familiar										
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Hoffman	Rebecca			
Somewhat familiar	Agree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Disagree	Disagree					Naturopathic Physicians
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Unsure					
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Agree	Agree					

Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree								
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Disagree The applicant claims that naturopaths receive similar schooling to medical doctors. However, there is no examination of the actual courses and what is taught only the course titles and hours. There is not an outside review of course materials or the licensing exam meaning there is no way to know what naturopaths are trained on besides vague concepts. They also are required to do far less in the way of clinical hours with no residency requirements. We should not be substituting under-educated practitioners to meet the need in rural communities. Rural communities deserve access to science-based medicine.	Disagree	Disagree	Disagree Naturopathic schooling is highly biased and includes training on practices that have no scientific backing such as homeopathy. This displays a lack of critical thinking in their providers. Patients are often not made aware of the fact that they are receiving treatments that are unregulated, unhelpful, and unscientific and when you look at outcomes of patients receiving care not based in medical science, end of life cancer patients experience more pain and decreased quality of life from those who received conventional medical treatments.				
Very familiar	Agree	Disagree Naturopathic programs do not have sufficient minimum education and training requirements	Disagree There are no limits or safeguards and the applicant's proposal is the definition of unsafe.	Disagree Absolutely not - even minor procedures can have major complications that naturopaths cannot handle	Disagree The "Board" is a joke and does not regulate naturopaths practice. At best it rubberstamps everything and at worst it directly participates in gross medical negligence.	Srinivasan	Vasisht		WA ACEP
Very familiar	Disagree	Agree Yes, but said naturopathic programs are already onerously expensive and, unlike allopathic and osteopathic programs, do not convey to the students the advantage of funding for clinical education and training arising from government subsidy. This subsidized funding makes Residencies much more attainable for MD's and DO's...whereas ND Residency funding is strictly non-governmental (privately funded by community-based naturopathic physicians and benefactors).	Agree strongly agree	Agree Yes...Minor 'office performed' surgical procedures are those which, generally, are commonly, safely and effectively performed in an office (as opposed to a hospital) setting.	Agree I believe that they have the MOST expertise to evaluate what additional education and training may be needed to safely expand naturopathic scope of practice	Milliman	Wendell	Bruce	Naturopathic physicians including myself, as well as my patients, those of my colleagues and concerned citizens of Washington
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Berger	Robin		Washington State Psychiatric
Not familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree There is in essence no formalized "hands-on" training, and they are not trained in surgery. Further, many of their practices are not based on randomized, controlled, trials.	Disagree Training for the requested increase in their scope of practice is not formalized, and there is no independent body to confirm competence. Their experts do not have sufficient breadth of experience to know when a trainee or practitioner is "safe".	Disagree There is no formalized training. The importance of training is not to learn to perform the procedure, but to ensure that the practitioner knows how to proceed when trouble occurs. Otherwise, potentially life altering and/or threatening complications can arise.	Disagree A Doctor of Naturopathy is NOT equivalent to a Doctor of Medicine.	Salazar	Marco	A	Myself
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				

Somewhat familiar									
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				N/A
Very familiar	Disagree	Disagree None of their education as it currently stands would prepare them for this and they have no internal mechanism to ensure that those already practicing would be able to adequately learn and certify themselves to an acceptable standard	Disagree	Disagree What part of "natural healing" means that someone would require a minor office procedure (or a schedule II-IV drug) that would seem to go directly against their principles. What happens if there is a complication with one of the procedures? Will they be referring the patient to the naturopathic emergency department?	Disagree	May	Ian		
Very familiar	Disagree	Agree	Agree	Agree Knowing that guardrails and definitions will be placed during Department rule making	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar									
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Hearst	Alison		
Very familiar	Disagree	Agree							
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree Naturopaths cannot prescribe.	Disagree	Disagree	Disagree	Neutral			
Somewhat familiar	Disagree	Disagree							
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Disagree Prescribing opioid medication is a very slippery slope and needs to highly regulated with only specialty trained physicians allowed to prescribe opioids. "Minor" office procedures can turn into patient nightmares because of complications, infections, lack of training and, or knowledge about the procedure or risks. It is crucial in the medical world to know what you don't know, then stop and refer to someone who knows the procedure very well.	Disagree Prescribing opioid medication is a very slippery slope and needs to highly regulated with only specialty trained physicians allowed to prescribe opioids.	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Unsure	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Unsure	Disagree	Disagree				

Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Bunnell	Aaron		
Somewhat familiar	Neutral								
Very familiar	Agree	Agree	Agree	Agree	Agree	QUINONEZ	JAIMEY		
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Coshow	Karen		
Very familiar	Disagree	Agree These statements need to be edited for accuracy and removal of non-factual information: "It is difficult to compare naturopathic educational programs to medical and nursing programs because the focus of the training is so different." - This is an opinion, not a fact. Naturopathic programs are doctorate level and include biomedical sciences, body systems/interactions, and specific courses dedicated to pharmacology like other professions. These programs have evolved to include more pharmacology courses. Naturopathic medical school integrates all of their courses with pharmacology, including all of their continuing education. They are also required to study pharmacology within their CE requirements. However, the four-year naturopath also includes courses and treatment options in botanical medicine, exercise therapy, hydrotherapy, nature cure, acupuncture/traditional Chinese medicine, and homeopathy. (((This leaves less time and focus on pharmacology-related training and sciences.))) - this statement is not correct, the average time an ND student takes to graduate is actually 5 years, because the credit load is so much more per quarter than standard medical school. ARNPs, PAs, and NDs have pharmacology-specific training, while MDs "appear to integrate it into interdisciplinary blocks." - This statement is not a fact. In fact, ND's do integrate their course curriculum like their MD peers. In fact, they take additional coursework to include the other modalities. Which makes them excellently trained for preventative outpatient care, along with point of care management for pharmaceuticals.	Agree To obtain our DEA in WA state, ND's already are subject to taking the mandatory 8 hour course on opioid and addiction medicine. Any training that is deemed necessary can also be added to our training if needed. Such as in California, "NDs must include the following in their licensure application: (1) whether they intend to furnish or order controlled substances, and (2) provide written evidence to the licensing authority that they have completed at least forty-eight hours of instruction in pharmacology that included the pharmacokinetic and pharmacodynamic principles and properties of the drugs they are furnishing or ordering." ND's in WA state are also already required to obtain 15 hours of pharmacy within their continuing education of 60 hours. I have also thoroughly reviewed the data of disciplinary actions against ND's in the states that allow ND's to prescribe controlled substances, and they are few compared to the massive amount of disciplinary action against MD's / DO's and that doesn't include the amount of DEATHS caused by over prescribing. Prescription drugs are the 3rd leading cause of death in America, next to heart disease and cancer. Even though the MD's think they are the leaders, they are absolutely causing harm by being closed minded to other modalities of care. (This also includes chiropractic, physical medicine, PA/ARNP's as primary care providers).	Agree The definition by law of "minor office" and as we are trained as ND's : Minor office procedures means care incidental to superficial lacerations and abrasions, superficial lesions and the removal of foreign bodies located in the superficial tissues, except eyes, and not involving blood vessels, tendons, ligaments or nerves. "Minor office procedures" includes use of antiseptics, but shall not include the suturing, repairing, alteration or removal of tissue or the use of general or spinal anesthesia. Minor office procedures does not include anesthetics or surgery. The Sunrise review seems to not interpret the law, and are unwilling to work on clarifying this which can significantly interfere with ongoing patient and access to care. ND's are not asking for abortion medicine or vasectomy, which is not considered minor office, and please stop including this nonsense to confuse the public.	Agree The board of other professions to include as an example, the Chiropractic Quality Assurance Commission (CQAC) is all self-regulated, as well as the Board of Physical therapy for example. Naturopathic doctors are also a self-regulated profession, with their own board exams, as well as their own national association. They do not belong to the American Medical Association, and do not plan on practicing akin to MD's. As a reminder, the providers who started the opioid epidemic (and yes this is a United States problem, not global) were Medical Doctors.	Apfelbaum, ND	Allison		Primary care ND's in the state of WA
Very familiar	Disagree	Agree	Agree						
Very familiar	Disagree								
Somewhat familiar	Disagree	Neutral We receive training not not all providers opt to offer minor office procedures. Those that offer in their practice are quite rigorous in maintaining their skills and many have received other training and/or carry concurrent licenses (midwives, EMTs, ARNPs) that support their practice							



Somewhat familiar									
Somewhat familiar	Agree	Agree I have read the requirements for a naturopath in Washington state and feel that they are wholly qualified to be effective primary care physicians. Based on previous experiences of having a naturopath as my PCP, I specifically choose naturopathic doctors when looking for a PCP. As a Navy veteran, my healthcare did not pay for services performed by a naturopath. I believe if the whiter medical community were to give naturopath doctors, the credence, they deserve that the veterans administration would follow suit. I chose to pay out of pocket rather than choose a new PCP who was not a naturopath. All my experiences with naturopath doctors have been outstanding. They look at medicine from a holistic perspective, which I find invaluable with my multiple medical conditions.	Agree						
Somewhat familiar									
Somewhat familiar									
Very familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree								
Somewhat familiar	Agree								
Not familiar	Disagree	Unsure	Unsure	Disagree	Disagree				myself a retired MD
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree				Summit Pacific medical center
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree I work alongside ND providers on a daily basis. Based on this, it is clear to me that there is insufficient training about appropriate candidates and length of use of controlled substances. My observations also show lack of understanding about how these medications can harm both in the short and long-term. Giving a stimulant to a patient with severe heart failure for weight loss is beyond inappropriate. It has been requested multiple times	Disagree An ND license is not recognized by CMS, therefore, I do not think prescribing controlled substances in the state of Washington is a good idea. especially when their educational systems cannot demonstrate if they have knowledge to do this safely.	Disagree	Disagree				I am practicing physician and an associate program Director of a residency training program for family medicine in the state of Washington.
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Hippe	Scott		Washington

		I provided testimony during the meeting stating similar: naturopathic training does not incorporate sufficient training or supervised practice (such as would an allopathic medical residency) to be safe prescribing scheduled controlled substances or to perform the procedures they would be allowed to perform under their proposed expansion of scope of practice.							Academy of Family Physicians
Very familiar	Agree	Agree	Agree	Agree	Agree				Justin Taylor, ND
Somewhat familiar	Disagree	Agree I agree that the current state of naturopathic education with regard to controlled substances may not prepare those practitioners sufficiently for prescribing controlled substances. However, I see no reason why a program to train naturopaths couldn't be designed and implemented, for those who want to be able to prescribe controlled substances.	Neutral	Neutral I do not believe I am properly qualified to assess this particular point.	Unsure				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar									
Very familiar	Disagree	Disagree	Disagree	Neutral	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				Summit Pacific MAT clinic
Very familiar	Disagree	Agree	Agree	Agree	Agree	Lee	Mi-Jung		
Very familiar	Disagree	Agree Yes, whatever information the Department of Health used for this was wrong. All current information was provided and somehow it got twisted in to things that are not true.	Agree Yes, and safeguards come with rule-making once the scope is expanded the regulatory board sets limits and rules on prescribing.	Agree ND's have been doing minor office procedures such as removing cysts, moles, sutures, and many other things are part of the training for many many years safely. To clarify some injections are was less invasive than what naturopathic doctors can already do as part of their training.	Agree The Board of Naturopathy is lacking sitting board members for years now because the governor's office isn't appointing anyone. Those who are sitting on the board have necessary education and training to regulate the profession.				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				



		We need more education around pharmaceuticals							
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Song	Patricia		
Very familiar	Disagree	Agree ND pharmacology training meets or exceeds PA and DNP programs.	Agree	Agree	Agree	Magoun	Benjamin		self
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				Myself, a patient of NPs
Very familiar	Disagree	Agree Naturopathic medicine saved my life by identifying an successfully treating environmental illness caused by mold. Had tgey been allowed prescription privlages, they would gave been able to treat my illness more quickly by me not having to enlist allopathic doctors.	Agree						
Somewhat familiar	Neutral	Neutral							
Very familiar	Disagree	Agree	Agree	Agree	Agree	Roberts	Chenelle		
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Codino	Heidi	R	
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Agree My Naturopathic doctor knows how my cells work for me, and where I needs help and how. No Medical doctor talks to me about the cells in my body and how they work and what will help me and why.	Agree						
Very familiar	Agree	Agree	Agree	Agree	Agree	Valley	Chris		
Very familiar	Disagree	Agree I am a Naturopathic Physician of 23 years. In all that time, I've never caused any issues with drugs I've prescribed or helped patients wean off. In addition, many patient move their entire health care to me. Yet, they have to find a conventional doctor to prescribe one or sometimes 2 drugs that are out of my scope. Often, they either can't find an MD, or have to wait months to see an MD for one or 2 drugs.	Agree	Agree	Agree	Shannon	Tim	Paul	
Somewhat familiar	Disagree	Neutral	Agree	Neutral	Neutral				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Santos	Hatha	Gbedawo	
Very familiar	Disagree	Agree	Agree	Agree	Agree	Louise	Edwards		myself
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree								
Very familiar									
Very familiar	Disagree	Agree	Unsure	Agree	Agree				My own career &





		My ND is more knowledgeable and better educated on current studies and results than any MD I have ever seen.								patient
Very familiar	Disagree	Agree	Agree	Agree	Agree		Hobson	Amy		myself
Very familiar	Agree									
Somewhat familiar	Agree	Agree	Agree	Agree	Agree					
Somewhat familiar	Unsure	Agree	Agree	Agree	Agree		Burns	Denise		Myself as a patient
Very familiar	Agree	Agree	Agree	Agree	Agree					Dr. Nicole Taylor
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree I have been a practicing ND in this state for 5+ years. This limitation has only hurt the population we serve as primary care providers. We are in a state with a severe shortage of PCPs. We represent an untapped source of PCPs. Our training is more than adequate.	Agree OR and ID have better scope than WA.	Agree	Agree		Panza	Jessica		
Very familiar	Disagree	Agree	Agree Of course, any expanded scope will be included in board exams and continuing ed will be available.	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Somewhat familiar	Agree	Agree	Agree	Agree	Agree					
Very familiar	Agree	Agree	Agree	Agree	Agree		Ferguson	Linda	Sue	Self
Not familiar	Unsure									
Very familiar	Disagree	Agree Training programs consist of significantly more training than nurse practitioners and PAs, who also do minor surgery and prescribe medications. My understanding is that they have thousands of clinical hours between preceptorships, clinic rotations, and residencies.	Agree	Agree NDs fill a vital role in primary care in Washington state, which includes minor office procedures.	Agree ND providers have been part of the healthcare ecosystem in Washington for decades and are the first resort for many patients who cannot get in to see other PCPs. Expanding the ND scope means expanding access to healthcare for all Washingtonians. The Board makes conservative recommendations to protect public health while increasing access and is bound by professionalism as other professions are.		Pozin	Rebecca		Sammamish WA Resident
Very familiar	Disagree	Agree	Agree	Unsure	Agree					public interest
Very familiar	Disagree	Agree I am a naturopathic doctor and I have a history in emergency medicine in the US Army. I feel confident that NDs licensed in WA have and will have up-to-date training to expand scope of practice to meet patient needs more efficiently.	Agree	Agree	Agree		Lipscomb	Brandy		
Very familiar	Unsure	Agree	Agree	Agree	Agree		Henderson	Christopher	Allen	Self
Very familiar	Disagree	Agree								
Very familiar	Disagree	Agree	Agree	Agree	Agree					







		the issue is not our training or education; the issue is that our name "naturopathic doctors" is not protected so we have to deal with programs claiming to certify naturopaths with subpar, non-accredited programs. We need to separate from those people/and programs otherwise we're working in mud, expecting not to get muddy.			See my comment above. We have trained people, but anyone can call themselves a naturopath, which confuses the public. Perception matters, and our name is not corrected. It makes no sense to go through the training we go through as NDs without that protection. A doctorate degree should offer us some brand of protection, and by having that part covered, we can end up having fewer battles over what they perceive our skills to be, compared to what we actually know.				
Very familiar	Disagree	Neutral I believe some of the information regarding ND training presented in the report is incorrect.	Neutral	Neutral					
Very familiar	Agree	Agree							
Somewhat familiar	Neutral	Agree	Neutral	Unsure	Neutral				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree Graduating Naturopathic Doctors have sufficient education and training for these proposed changes.	Agree	Agree	Agree	Trainor	Brian		
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree Beyond minimum.		Agree	Agree	Lipelt	Michael		self
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar									
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Not familiar	Unsure	Unsure	Unsure	Unsure	Unsure				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Nicole	Egenson		
Very familiar	Disagree	Agree We have more than enough education and stricter philosophies on these medications than any other profession.	Agree	Agree	Agree If anything our board has been more disciplining than other professions, refer to the harsh punishment of providers on MMJ that is now legal in the state of WA.	Fahoum	Mona	T	My practice, my patients, my family, my profession
Very familiar	Disagree	Agree	Agree	Agree	Agree	Bachman	Melissa		
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Lutack	Bobbi	Blair	

		I have been practicing primary care medicine for 30 years in Seattle and am the PCP for most of my patients without issue EXCEPT for the inability to at times prescribe a simple short term pain medication or prescribe e.g. ADD meds and have to refer my patient out to someone who can. This is VERY inefficient and frustrating on all sides.	I am not aware that there are significant issues with ND's and controlled substance(s) prescriptions in these other states so am confused why it would be an issue in WA. state? Some ND's may not care to prescribe controlled substances. Perhaps there could be additional testing for those of that do to ensure proper training?		After 30 years of primary care I can confidently say there "isn't much I haven't seen!" I have patients see me for decades or come to me because they are not satisfied with their experience with conventional medicine. I offer more time, more personalized service, I "know" my patients and I have a great deal of experience. I know when to refer and when I can safely treat a patient.					
Very familiar	Disagree	Agree	Agree	Agree	Agree	Cartwright	Maria			
Very familiar	Agree	Disagree Naturopathic programs are not designed to train individuals in surgical procedures. These interventions are the antithesis of the philosophical principles underpinning the discipline of naturopathic practice. Similarly, prescription of scheduled and legend pharmaceuticals would seem to be contradictory to these same fundamental tenets of *naturopathic* therapies.	Disagree Prescription of scheduled and legend pharmaceuticals would seem to be contradictory to these same fundamental tenets of *naturopathic* therapies, possibly as a consequence, the rigorous education offered in physician training programs safe and rational administration of advanced medications is lacking in naturopathic schooling.	Disagree Naturopathic programs are not designed to train individuals in surgical procedures. These interventions are the antithesis of the philosophical principles underpinning the discipline of naturopathic practice.	Disagree The structure of the naturopathic oversight board is self-serving; these ancillary disciplines should be required to have much more detailed oversight by the Washington Medical Commission	Bramhall	John			Washington State Medical Association
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Agree	Agree	German	Holly			Naturopathic Doctors
Very familiar	Disagree									
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Somewhat familiar	Disagree	Disagree	Disagree	Neutral	Disagree					I am representing myself. I am a third-year MD student at the
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Somewhat familiar	Agree									
Very familiar	Disagree	Agree ND education and training requirements meet or exceed those of Nurse Practitioners, who already have independent practice authority in Washington.	Agree	Agree	Agree While I agree that the proposal is appropriate, WANP could consider the addition of one MD and one PharmD to the Board as a mechanism to blunt this criticism.	Birdsall	Timothy	Carroll		N/A
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree					
Not familiar	Agree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Very familiar	Disagree	Agree	Agree	Agree	Agree					
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
Very familiar	Disagree	Agree	Agree	Agree	Agree					self
Not familiar	Unsure	Unsure	Unsure	Disagree	Unsure					You emailed me!



Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Rue	Katina		Washington State Medical
Very familiar									
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				CoAND
Very familiar	Disagree	Agree It's not like naturopaths have gone backwards in their requirements and they, as a group, have been very responsible with their formulary thus far.	Agree	Agree	Agree	Tackett	Kate		Naturopathic Doctors
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree The applicant has not demonstrated sufficient clinical training and experience diagnosing and managing psychiatric conditions, especially those that require broad knowledge and experience with substance use disorders and Schedule II medications. Those conditions and prescriptions have fatal consequences if mis-managed.	Disagree Allopathic and osteopathic physicians who manage conditions treated with controlled substances; or withdrawal from them, have extensive supervised training for such treatment. ND application did not demonstrate the training	Unsure My specialty training (psychiatry and public health) are insufficient to comment on this question.	Disagree The teacher must have the competence first. The application appears to admit the absence of such competence, if the object is to expand scope of practice that is not currently practiced by the teachers and mentors.	Lebegue	Breck		Self, and WA State Psychiatric Association Legislative Action Team
Very familiar	Disagree	Agree I have held a DEA registration in Oregon since they were first offered to us, about 40 years ago. I have had the privilege of prescribing opiates for most of that time, and occasionally I have done so. I have never had a problem, complaint, or issue. I have taken DEA course in opiate prescribing and safety. I have taken other coursework since graduation in opiate and other controlled substance prescribing and safety. I am not aware that we have had any issues with this in Oregon, but I may be wrong about that.	Agree	Unsure I think the definition of such procedures needs clarification.	Agree	Zeff	Jared		myself
Somewhat familiar	Disagree	Neutral It is the intent of licensing Boards to insure there is "minimal competence" and I did not see the Sunset committee even identify that in terms of ND training.	Neutral I served on the licensed Board for Oregon in the 2000's for 7 years. I prefer optimal standards as the goal and to work towards them over time.	Unsure I read the entire report and will have to reread it to understand what the questions is referring to.	Agree	Garcia	Gregory		
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				

Very familiar	Agree	Agree	Agree	Agree	Agree				NDs
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Gurevich	Itana		Self
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Netherland	Valerie		
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	McKay	Deborah		
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Davison	Kevin		
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Neutral	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				Myself
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				







Very familiar	Disagree								
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Disagree	Unsure	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree After reading the applicant report and the DoH recommendations, the author of the report is blatantly misleading regarding proven, established facts regarding the content, quantity and quality of graduates of CNME Naturopathic Doctor programs.	Agree Just like the report produced in response to the applicant report - this is a subjective, leading question.	The definition of minor office procedures is defined in ND statute RCW 18.36A.020. The applicant report does not propose anything different or misleading. Again a very misleading question	Agree				Myself - a resident of WA State and patient of an ND
Very familiar		Disagree	Disagree	Disagree	Disagree	Tappel	Anna	Christine	
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Tappel	Anna	Christine	
Somewhat familiar	Agree	Disagree Naturopathic education is not held to sufficiently rigorous standards, which does not equip the graduates appropriately to provide safe care. Patients ultimately are the ones who experience harm	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree I think the training here is significantly limited and of significant concern.				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Bliss	Lisa	S	Self
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Komarow	Julie		Myself
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Grande	Lucinda		self
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree As noted in the WSMA comments, the description of "minor office procedures" is very vague.				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Turowski	Jonathan	G.	Myself

		MDS and DOs have gone to school for a minimum of 11 years. Dermatology residency is at minimum 3 years. I am a nurse practitioner and would never think my 6 year education was equivalent, let alone a 4 year education that naturopaths need. I always work with MDs and DOs because I respect their practice and keep patients safe.	Narcotics are dangerous, and the opioid crisis is believed to have stemmed from over prescribing of narcotics for routine medical practice.	Minor office procedures such as liquid nitrogen or biopsies take time to develop. I was trained for many years in dermatology to learn how to minimize scarring and take adequate samples.	They are not board certified dermatologists				
Somewhat familiar	Agree	Disagree Naturopathic education and experience is very inadequate.	Disagree There is no supervision in their proposal, and the Naturopathic Board does not have the expertise or experience to oversee this.	Disagree Their proposal seems to be unlimited.	Disagree	Hawkins	Richard	Scott	Myself
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree Totally inadequate- at best a four year program vs generally 10 years minimum for allopathic physicians who must pass examinations along the way and have Board Certifications for most. Naturopaths do not have Board Exams and do not have any academic certification except a diploma from a naturopath training facility. I would challenge them to try and pass any exam that is mandatory for regular physicians.	Disagree Totally inadequate and untested training. Absolutely "crazy" to allow them controlled substance authority	Disagree Minor office procedures is too open ended and would allow a naturopath to do practically anything in an office without proper training or evaluation of skills.	Disagree Naturopaths, with extraordinarily limited training, advertise themselves as alternatives to allopathic physicians by denouncing allopathic care. However their legislative intent is to become allopaths by legislative decree ignoring their woefully inadequate training. And who will monitor them if this outrage passes? Why the board of naturopathy-all of whom are inadequately trained. As a minimum, they should be required to take and pass the tests that are mandatory for allopathic physicians. They actually do not have a board examination for their own discipline. What we have here is "wanna be physicians" by legislative decree and not by any even minimal standard of competence. Note that when naturopaths actually get sick themselves, they seek out allopathic care-not naturopathic "care" as they are aware of their limits which are substantial.	Bensinger	Richard	E.	Represent self as an MD-board certified and the WA State physicians organization
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree Dermatologists spend 4 years of med school and 4 years of training in the field of dermatology. Naturopaths should not be practicing dermatology as they do not have the appropriate training.	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree							
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree Naturopaths receive very little, if any training, in procedures. They certainly do not have experience with more invasive procedures or complications that might land someone in the hospital that a physician needs to have to be able to manage adverse procedure-related events.	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				Physicians who ahve trained and
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				

					Naturopaths should not have any expanded scope of practice for the safety of patients in Washington state. Experiences from my own patients for the past 8 years practicing in WA have demonstrated unnecessary testings by naturopaths which add to the cost burden of health care as well as unnecessary supplements recommendations which can be harmful rather than beneficial.				
Somewhat familiar	Agree	Disagree Naturopathic programs do not have sufficient education and training requirements for in office procedures	Disagree	Disagree	Disagree	Schachtel	April	K	
Not familiar		Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree Minimum educational requirements are a masters level degree in a healthcare profession. Naturopathic physicians complete a doctoral degree with clinical internship hours. Naturopathic programs have sufficient and necessary education and training for Naturopathic physicians to prescribe medications in Schedules II-V.	Agree In order for healthcare providers to receive and renew a DEA license they are required to complete an 8 hour training on MAT/MOUD. Naturopathic physicians are required to complete this training just like all other healthcare providers that are registered with the DEA.	Agree	Agree	Kasten	Wahji		Lower Elwha Klallam Tribe
Somewhat familiar	Disagree								
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				Myself
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree While clinical pharmacology credits and supervised clinical practice are a part of ND training, simple pharmacology courses and basic sciences are insufficient in affording NDs the minimum expertise needed to prescribe controlled substances. An MD/DO student not only receives integrated pharmacology training through blocks of instruction, but often also receives similar credit in pharmacology courses as NDs, but this is an expansive course covering hundreds to thousands of medications with often one or two lecture hours spent on individual classes of medications; and these courses do not similarly cover alternative medicine aspects often taught in ND courses, further limiting the amount of time given to evidence-based pharmacology and the mechanisms and risks associated with high-risk prescriptions. While basic didactic education requirements may be similar, the supervised clinical training expected of an ND (1200 hours) versus an MD/DO (presumably 9000 hours in a family medicine residency) suggests there is greater complexity to managing the care of people than is let on by naturopathic medicine advocates. Combining expansive prescription powers with a lack of similar minimum requirements to supervised training puts at risk the health of the patients in the care of ND practitioners.	Unsure	Disagree	Disagree				
Very familiar	Agree	Disagree Comparisons were made to PA education, and WAPA submitted comment to the legislature that their understanding of our pharmacologic training is inaccurate.	Disagree I repeatedly see violation of guidelines based care - overdosing of reproductive hormones, thyroid hormone, and have even treated chemical burns from patients using herbal salves.	Disagree Some of these were not minor office procedures.	Disagree	Lumsden	Joshua		Opinions my own, but I am president of WAPA.
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Meadows	Richard	Paul	Kadlec Regional Medical Center

Very familiar	Agree	Agree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree Most MDs refer to dermatology for skin biopsy. The practical skill itself is not the most challenging aspect. It is the medical knowledge -- understanding which lesions to biopsy, in what fashion, in what location, for what purpose, and with what processing -- that requires advanced specialty training from medical school through medical residency.	Disagree	Disagree	Disagree	Ferguson	Ian	M	
Somewhat familiar	Neutral	Disagree	Disagree Until NDs have the same rigor of training and pharmaceutical awareness of the classes of drugs and interactions with compounds they may be dispensing, I do not feel comfortable allowing pharmaceutical rx privileges to NDs.	Disagree I don't think NDs have sufficient training and supervision or MOS programs to guarantee competency at any stage of their training insofar as office procedures	Disagree				Self, physician
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Not familiar	Agree	Disagree							
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar									
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar									
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Manson	Tim	P	myself
Very familiar	Disagree								
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree								
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	O'Brien, MD	David		
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Brunsvold	Nancy		

		Naturopaths do not have the training to prescribe many medications especially narcotics. As an internist, I had to unwind situations where a naturopath's poor care endangered a patient. I know there is a shortage of primary physicians. Unfortunately naturopaths are not trained to safely fill this need. There are other logical ways to increase the availability of safe primary care.							
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Should have a list of specific procedures and the training that was done for them.	Disagree	Would need MD or DO supervision since Naturopaths have far less training		
Somewhat familiar	Agree	Disagree							
Not familiar	Disagree	Disagree I am a 52 year old FP who has practiced full scope primary care in WA state for almost 20 years. I have trained dozens to hundreds of medical students and residents. In the past 2 years, I have started a practice alongside a ND who I respect as a competent and caring person and physician. Initially, learning about their training and education, I was skeptical about ND's scope of practice. Then for a while in this journey I was more open to consideration of ND's having increased scope. However, through side by side clinical practice, sharing patients, fielding my partner's questions, seeing my partner treat diabetes and hypertension (1 drug yes, more than 1 drug, no) seeing my partner react in urgent situations, and better understanding the scope of experience my partner has had (we are the same age, practicing around the same number of years), I DO NOT SUPPORT ANY EXPANSION OF ND LICENSING. Again, this is not personal--I LIKE my partner, and my partners knows way more about practice management than I do. But I am concerned that I don't know what he doesn't know, and I am not sure he always does. ND's are focused on wellness, although sometimes on people that MD/DO's have worked up for the usual suspects and not found problems. And yes, sometimes they help where we could not. But we MD/DO's take on the risk and responsibility of finding the life threatening problems, treating with high risk medications (including opioids) and doing procedures. I have very hard time thinking that a ND student would have sufficient training for office procedures such as endometrial biopsies, skin biopsies, vasectomies, ekg readings, IV fluids, IUDs. It's not that theses things can't be learned--from MD/DO's--but would have to be formalized training.	Disagree	Disagree	Disagree	Unsure	Ewing	Kristine	self
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Disagree			
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Disagree	As an MD over many yearsI have shared patients with serious health concerns with ND's. They have mismanaged their patients and delayed routine Gyn surgery resulting in need for emergency surgery for conditions such as ectopic pregnancy and large ovarian neoplasms. Some were professors at their ND school.	Sharmahd	Steven
Very familiar	Agree	Disagree this is pure insanity to let naturopaths expand their scope of practice in this manner.	Disagree Nautropathy is totally unregulated as it is, given that the "regulatory" body is just a bunch of naturopaths. These practitioners can pretty much make up anything with zero science and do whatever they want. Their current scope is way too broad and the proposed increase in scope is insane.	Disagree They have zero training in procedures. Might as well just let insurance agents do open heart surgery.	Disagree None of the current providers have any expertise in the proposed expanded scope because no other state is stupid enough to allow this. We are already idiots for allowing naturopaths to prescribe testosterone and other drugs.	Disagree			A normal, practicing physician who did 4 years of undergrad in the
Very familiar	Agree	Disagree	Disagree	Disagree It does not define any clear limits of a minor office procedure.	Disagree	Disagree			Self

Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Ellingsen MD	Megan		
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Matthews	Micah		Washington Medical
Somewhat familiar		Agree	Disagree						
Very familiar	Agree	Agree	Agree	Agree	Agree	Malapit	Nicole		
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				myself
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Brutocao, MD	Claire		
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Unsure	Unsure	Neutral				N/a
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Agree	Disagree	Disagree				Physician
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				Myself. Licensed physician with board certification in preventive medicine, emergency medicine and forensic examination. 55
Very familiar	Agree	Disagree The proposal does not demonstrate sufficient minimum education and training to safely prescribe Schedule II-V controlled substances.	Disagree The other states that grant authority to prescribe controlled substances limit naturopaths to Schedules III-V or specific formularies and include safeguards such as collaboration or supervision by MDs, additional or continuing education, an additional pharmacology examination, and oversight by the state medical board.	Disagree The proposed definition of "minor office procedures" is vague and subject to a wide range of interpretations. The department cannot evaluate adequate training without knowing what specific procedures would be included in this definition.	Disagree The Board of Naturopathy does not include practitioners with sufficient expertise to evaluate what additional education and training is needed to safely expand naturopaths' scope of practice.	Cabrera	Alvin		
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				Myself only
Very familiar	Disagree	Agree	Agree	Agree	Agree ND's are more than qualified and clearly meet the criteria to have their scope expanded. I do NOT understand the DOH's position in not supporting giving ND's this authority. In reading the summary of opposed responses, I ask, "Why are MD's feeling threatened? What are they afraid of?" Why were there few comments from MD patients? I do not believe the comments made against the expansion, speak from an accurate knowledge of the training NDs complete. I believe the DOH should reconsider and welcome the professional ND's assistance, training and experience to serve our communities.				Patients who appreciate the care and professionalism we receive from ND's!
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				Self
Somewhat familiar	Agree	Neutral	Agree						

Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Unsure	Disagree	Disagree	Disagree	Disagree				Healthcare providers
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar									
Very familiar	Disagree	Agree Naturopathic doctors go through very rigorous and intense studies and training to become proficient in being a health care provider. The department should visit one of the local institutions to understand the scope of the education.	Agree	Agree	Agree	Shober	Nathaniel		Self
Somewhat familiar									
Somewhat familiar									
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				Myself, a board-certified family
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Not familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree ND's simply do not have the evidenced-based education, training, or oversight necessary to safely practice the scope of what they suggest in this proposal.	Disagree	Disagree This wording is too vague and open to dangerous interpretation putting patients at risk of serious harm or death.	Disagree The Board of Naturopathy does not possess the evidence-based training or expertise to speak or act with any authority on these matters.	Finkbonner	Jason		
Very familiar	Agree	Disagree You only have to care for a few patients harmed but what NDs don't know to understand the risks of expanding their scope without training.	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree Allowing naturopaths to function as equal to physicians is ludicrous and dangerous.	Disagree These are not physicians and should not and never have been allowed to play medical doctor in this state.	Disagree				Patients, physicians, my family and friends and fellow
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree They lack training.	Disagree They do not have adequate training and supervision.	Disagree They do not have adequate training and oversight.	Disagree They do not have adequate training and are incapable.				Patient
Not familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree Naturopaths are interested in using natural resources. Let them. Pharmaceuticals should be left to physicians who studied pharmacology and had a residency where they were taught to practice their knowledge with an attending physician monitoring their patients.	Disagree Minimal effort here to grant maximal powers. We are already suffering under the yoke of opioid overdoses. Why increase the supply to our citizens.	Disagree Minor office procedures can mean anything if you're brave enough. Appendectomy can be performed with local anesthesia. Doesn't mean we should.	Disagree If they want the powers of a physician in Washington State, they should be governed and censured by the medical board.	Kim	Sung-Won		Northwest Academy of Otolaryngology
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				

Somewhat familiar	Agree	Disagree Do not approve or agree with current proposal	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree The applicants imply that the reason ND's should be allowed to prescribe schedule II-V drugs is that ND curriculums include "13.5" hours of training in pharmacology where MD training is "unspecified" in the number of hours in pharmacology. This is an irrelevant comparison give that MD's then go on to complete hundreds to thousands of supervised hours of practical, supervised pharmacology/drug prescribing and use before being certified to independently practice. 13.5 hours is paltry and perhaps enough training to understand a type of medication or facility of drugs, but not the entire breadth of the pharmacological spectrum, the risks, adverse events and interactions possibly seen.	Disagree No one will likely supervise these practitioners, just as they practiced unchecked treating patients with hydroxychloroquine and ivermectin during Covid, they will continue to treat chronic Lyme and other made-up diseases for cash and profits, misinforming the public and practicing non-evidenced based medicine.	Disagree There are no safeguards, supervision, guidelines, and the vagueness of "some office procedures" is alarming. Do they plan to do retinal surgery? Vasectomy? Amputations? No one can say. Nearly anything can be done in the office with enough support.	Agree One only knows what one knows. It would behoove the board of NDs to include others who may have greater knowledge or experience, such as allopathic physicians, in the practice of medicine "holistic" or otherwise.	Thorndike	Jonathan		Myself
Very familiar	Agree	Disagree Naturopaths do not practice evidence based medicine and are not doctors.	Disagree Naturopaths are not physicians and should not have ability to prescribe controlled substances. They currently practice outside their scope and think everything is due to hormone imbalance or mold. They are doing harm to the public and people are dying from untreated cancer or inflammatory diseases. Imagine if they have prescriptive power for controlled substances.	Disagree They do not define exactly what type of procedures are in their scope. They also do not have sufficient training in surgery.	Disagree				Myself and the interest of the public and their health
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree Not enough training to expand their scope of practice for interventions such as abortion or vasectomy.	Disagree Should not have prescriptive authority for controlled substances. We already have issues with patient opiate management and this should be left to MD/DO's.	Disagree Not enough training to expand their scope of practice for interventions such as abortion or vasectomy. What they describe as "minor" is irresponsible.	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Agree	Agree						
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar									
Somewhat familiar	Agree	Disagree I am an Associate Program Director for Family Medicine residents. I am very familiar with the education needed for residents to become competent to practice family medicine. Suggesting that Naturopathic providers have the same level of training as family medicine physicians to have full prescriptive authority is unacceptable and unsafe for patients.	Disagree We have already been fighting an opioid epidemic for years and adding in additional prescribers who can prescribe controlled substances is concerning that this could worsen this problem. Additionally, there are growing numbers of inappropriate prescriptions for stimulants and other controlled substances. Again with more prescribers, there is increased risk for inappropriate prescriptions particularly in training is not appropriate for these prescribers.	Disagree Again, as noted as an Associate Program Director of a family medicine residency program we have clear ways to determine competency for procedures as well as a long history of knowledge of what is within scope for family physicians to perform. Minor office procedures is very vague and could include high risk procedures and there could be risk for including procedures for which there is not medical evidence for performing.	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Doaty	Sarah		



Somewhat familiar	Neutral	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Czarnecki	Maciej		
Somewhat familiar	Disagree	Disagree	Unsure	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree Many naturopaths are ignorant of health science and are dangerous, diverting patients from proper care.	Disagree	Disagree Naturopaths are not safe.	Disagree Deleterious to public health and safety.	Doucette	Joseph	W	
Somewhat familiar	Agree								
Somewhat familiar	Unsure	Disagree	Disagree	Disagree	Disagree				Physician
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Neutral				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Unsure	Disagree They absolutely do not.	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree I have cared for patients with iatrogenic harm from medications started by naturopaths for vague ailments. I'm an advocate for holistic care and integration of services, but as medications and disease management becomes MORE complex, expanding access for decisions for pharmaceutical care to naturopaths, or massage therapists, or PTs, has too much potential harm.	Agree	Disagree	Disagree	Bloom	Jessica		
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				Myself
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	muthuswamy	Karthikeyan		
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree I had no idea that Naturapaths were prescribing. Who allows this baloney? And the DEA goes along with it? Incredible.	Depender	William		
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				

			The legislative proposal to expand the scope of practice for naturopathic practitioners in Washington, which includes granting them the authority to prescribe Schedule II-V controlled substances and perform broader "minor office procedures," is deeply concerning. Naturopathic programs lack the rigorous and extensive clinical training that is foundational for safe prescription practices, particularly for controlled substances. The report highlights that naturopathic training does not include sufficient exposure to diverse patient populations or specific medical conditions, which is critical for managing the risks associated with these substances. Additionally, the proposed definition of "minor office procedures" is vague, making it challenging to ensure that naturopaths are adequately trained for these tasks. Given the potential risks to patient safety and the lack of evidence-based training in naturopathic programs, this bill should be rejected to maintain high standards of medical care and protect public health. If anything, the scope of practice for naturopaths should be rolled back. I have seen many patients in my own practice who have received from naturopaths loads of blatantly wrong or misleading information about their health and received batteries of diagnostic tests and vitamin therapeutics for which there was absolutely no evidence base. We need to do more to protect the public by restricting what these so-called naturopathic "doctors" can do.						
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Unsure	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Phelps-Tschang	Jane		Self
Somewhat familiar	Agree	Disagree	Unsure I do not have full knowledge of what other states allow for naturopaths, but just as with other medical degrees without sufficient training for independent practice, mandating practice with MDs could be a reasonable solution.	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Agree	Unsure				
Very familiar	Agree	Disagree The scope of practice creep in other areas such as podiatry, in the absence of sufficient education and training has hurt patients and increased healthcare costs	Disagree We see problems with prescribing habits in MDs and DOs who do not receive appropriate training. Were we to allow naturopaths who do not have sufficient and appropriate training to prescribe, we will see increased patient harm	Disagree NPs are not trained in office procedures. Were they to perform such, especially without oversight, avoidable patient harm would occur	Disagree Expecting NPs to police NPs would create the same type of quality and safety issues that we currently see with podiatrists and chiropractors policing their own. The quality of healthcare would decline and the cost will increase. We MUST protect patients who, by definition do not have the ability to determine if a particular practitioner is appropriately trained and capable.	Wicks	Brian	P	
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree This proposal in its entirety is dangerous for the citizens of Washington				
Somewhat familiar	Agree								

Very familiar	Agree								
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Jones	Portia		
Not familiar	Agree	Disagree	Disagree	Disagree					
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Vanzo	Mark		
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Beyond the fundamental illogic of a discipline that purports to be						
Somewhat familiar									
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	lucianna	mark		
Somewhat familiar	Agree	Disagree	Unsure	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	They do not have an equivalent training to physicians or even advanced care practitioners to ensure safety for patients	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar		Disagree	Naturopathic physicians do NOT have sufficient training and education						
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				myself
Very familiar	Agree	Agree	Agree	Agree	Agree	Walters	Jennifer		
Somewhat familiar									
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	schmidek	alexandra		
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Bergstrom	Kendra	G	Physician, Seattle,



Somewhat familiar	Agree	Disagree The foundation of naturopathic medicine is "Botanical medicine is a core modality for naturopathic physicians to use in optimizing the health and well-being of their patients". The philosophy of naturopathic medicine is somewhat different than allopathy, and having received a different model of training, these providers want to utilize the benefits of allopathic medicine without the training.	Disagree	Disagree	Disagree	mao	jennie		
Very familiar	Agree	Disagree	Disagree	Agree	Agree	Ouyang	Qin		
Very familiar	Disagree	Agree							
Somewhat familiar	Agree	Disagree I believe that naturopathic training is far inferior to allopathic training and they should not have the same privileges that MD and DO physicians have.	Disagree	Disagree	Disagree	Koala	Diana		myself as an OB/GYN (MD)
Very familiar	Disagree	Agree	Agree						
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Schiebel	Steven		
Very familiar	Disagree	Agree The DOH report is incorrect in stating that "Naturopathic programs do not require clinical training in diverse health care settings or exposure to specific patient populations or conditions, such as pediatric patients, patients with specific behavioral health conditions, and/or patients on pain management medication." At NUNM in Portland students are required to attend community clinics, which generally see patients with complex histories and health conditions. Students are also required to show proficiency in specific areas of medicine including direct patient care with certain patient populations and conditions. In states where NDs have Rx authority, they are disciplined less often per capita for inappropriate prescribing than any other provider type, again demonstrating that NDs training is sufficient.	Agree The application clearly states the naturopathic regulatory board will create education and training requirements to ensure there are sufficient limits/safeguards for NDs with prescriptive authority of controlled substances, additionally NDs will need to register with the PMP and obtain a DEA license. DEA required licenses to complete OUD training in order to be licensed. Also, the report is advocating that, "the most qualified health care professionals are prescribing opioids" when the opioid epidemic was created by these "most qualified healthcare professionals." NDs may also be able to help combat this epidemic. The Department of Health and Human Services (HHS) has released new buprenorphine practice guidelines that among other things, remove a longtime requirement tied to training, which some practitioners have cited as a barrier to treating more people. The ability for naturopathic Rx buprenorphine and similar medication assisted treatments (MAT) tied to their ability to Rx controlled substances. So while HHS is promoting more widespread MAT prescribing among practitioners, this report is claiming only very specialized providers should be prescribing controlled substances.	Agree	Agree As previously mentioned I agree that NDs have sufficient training in Rxing controlled substances, I therefore also agree that these providers have sufficient expertise in evaluating additional education and training needed to expand ND scope. Additionally, the board has assistance from the DOH. Naturopathic physicians do not live and practice in a vacuum. The NDs of the board are well aware of the consequences of inappropriate prescribing, and of addiction. They are also well aware of opioid prescribing guidelines that have been made widely available by organizations such as the CDC and WA DOH.	Galati	Laura		
Somewhat familiar	Agree	Disagree	Disagree As an LMHC, I often have to refer clients back to the allopathic system after potentially dangerous recommendations by naturopaths. More safeguards should be in place to protect Washingtonians from practitioners out of their depth.	Disagree	Disagree				
Very familiar	Agree	Disagree How can they possibly learn what a physician learns over their lengthy education? And what they learn in part is not accepted medical science. Some is quackery.	Disagree						
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Elder	Stephen	Joseph	
Somewhat familiar	Agree	Unsure	Unsure	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree Their education pales in comparison to that of a nurse or a physician, or a physicians assistant. Some of their education is quackery. Their proposal will put the public, the healthcare consumer, at risk and even in danger.				



Very familiar	Disagree	Agree There are licensing exams in place with supplemental exams that can be required as well depending on what each state determines is important. There is regular CME as well. However there has been much concern within the ND community that our Board of Naturopathy is unwilling to expand the CME offerings to include conventional medical sources which are standardized and often better quality. There have been several surveys of Washington licensed NDs that have requested this change and many meetings that were in favor of these changes. However through tampering of vote processes and continued voting by members with conflicts of interest and expired terms these have yet to be updated. We need these Board Members to face consequences for their continued misuse of power and conflicts of interest. There needs to be appointments of new members to the board to replace those with expired terms or these types of issues go completely unchecked.	Agree It is the same as other states. I am not really clear where the confusion lies in what would be different as all NDs receive the same education at accredited universities, and the licensing exam is the same. The only difference I could potentially see is that there is the option to do supplementary licensing exams in specific topics and some states will include those as part of the licensure for the state in addition to the general exam. The other thing that seems to be a factor is that the way NDs actually prescribe schedule medications is very different from the groups that have caused the opioid crisis, those were all MD groups or hospitals. To my knowledge there have not been any NDs named in any of the opioids overprescription court cases only MDs, ARNPs and PAs have that distinction.	Disagree For minor office procedures there is training as part of school and an supplemental licensing exam. If a practitioner is wanting to do more extensive Outpatient procedures they get additional training through CME. I would recommend having a set requirement for the CME so that it is more standardized for what meets that particular safety/training standard. Currently the burden is on the practitioner to determine if the extended training is adequate and it would be helpful to have a more standardized approach. This would also create a path for practitioners looking to gain additional training. Doing this in collaboration with other professions would be a great way to address some of the complaints I saw in the comments. NDs have always been team players in healthcare and refer out to specialists regularly when appropriate.	Unsure The Board of Naturopathy has at least 2 members who have expired terms that the governor has refused to replace. These 2 members have deliberately impeded the ability to update CME requirements to reflect more standardized primary care offerings consistent with the general medical professions standards of care. This has been done in spite of votes to expand CME and multiple surveys of licensed Naturopathic Doctors in Washington requesting that CME be expanded to include better quality options with standard care models. It has been a major conflict of interest and is detrimental to the profession and Healthcare as a whole. Many have sent in complaints to the board of health in this regard so that the Board Members may be replaced and no longer causing harm however no action has been taken.	Lofdaht	Victoria		
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree Naturopaths should not be prescribing I am so tired of this. Go to medical school. There is absolutely no comparison in our respective trainings. The pts in the ER I see from naturopath only is really scary what is not being evaluated properly as it is.	Disagree	Disagree				
Somewhat familiar									
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Neutral				
Very familiar	Agree	Neutral	Agree	Agree	Agree				N/A
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar									
Somewhat familiar	Agree	Disagree	Disagree	Disagree "Minor office procedures" is purposefully vague. Any incision of the skin without proper anatomic and surgical knowledge can result in catastrophic complications for patients including muscle, tendon, nerve and vessel damage amongst other things.	Disagree Unless you train in surgery, you should not be performing surgery. Period.				I am a board certified plastic surgeon representing all us surgeons who spent years of our lives training in
Somewhat familiar	Agree	Disagree Absolutely does not meet the minimum level of medical training and knowledge required to perform surgery	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree Not even close to current competent providers	Disagree No. They should stick to homeopathic therapies, per the tenants of their chosen field	Disagree No procedures are minor to the patient	Disagree No				
Somewhat familiar	Agree								

Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				self
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				ASPS
Very familiar	Disagree	Agree Pages 9-10 of the applicant's proposal clearly compares the hours of coursework in pharmacology across modalities. The graph on page 10 passes fact-checking and shows that naturopathic physicians are in their doctorate program longer (due to the most credits required by ALL modalities). NDs also must acquire the most pharmacology-specific credits out of ALL modalities. The next several pages clearly spell out that the naturopathic medical schools and curriculum adequately educate and train NDs for medical practice generally and for the prescription and management of controlled substances specifically.	Agree The proposal clearly details pharmacology-specific continuing education requirements in other states where NDs have prescriptive authority for controlled substances. Washington NDs are 1 of only 2 modalities requiring pharmacology hours as part of the continuing education curriculum. These pharm-specific credits are 25% of total continuing education credits. Those who have prescriptive authority currently are not required to have any pharm-specific continuing education training (except DNP-FNP). Not even MDs.	Agree	Agree	Matthew	Morgan		
Very familiar	Agree	Disagree							
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree Naturopaths are not physicians. It's that simple. They don't have the training nor the expertise to do these procedures.	Disagree Naturopaths are not physicians. This prescriptive authority should be confined to physicians and mid-level providers with the adequate training to manage patients on these medications. Naturopaths do not have that training.	Disagree	Disagree				
Very familiar	Agree	Disagree Naturopaths most definitely DO NOT have adequate education/training to perform procedures and prescribe controlled substances.	Disagree	Disagree ABSOLUTELY NOT. I am a surgeon and in order to gain hospital privileges I have to LIST all procedures by name and get signed off/approved to do all of these, and get re-accredited on a regular basis to continue to maintain privileges to do so. The lack of transparency by not listing EVERY procedure they want to do from NDs is abhorrent and intentionally deceptive. Additionally, they are absolutely not qualified to do procedural medicine in the first place, so this is a moot point.	Disagree It's like the blind leading the blind. I have no idea how the WANP could know if one has expertise when those who run the board do not have the expertise. This would be best evaluated by physicians who do have such expertise evaluating any further proposals to ensure proper patient safety and adequate clinical competence.	Colohan	Shannon		
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				Mercades Meuli, DO
Somewhat familiar	Agree	Disagree Residency training with one-on-one bedside mentoring is essential to learn the indications for or against performing a procedure, selecting the correct procedure and tools, learning sterile technique and learning local anesthesia and pain control methods	Disagree Naturopaths are trained in naturopathic treatments. They do not receive sufficient education in physiology or pharmacology to prescribe allopathic drugs. Medications with potential for abuse require even more caution.	Disagree	Disagree				
Very familiar	Agree	Disagree ND's have no formal training as proceduralists or in the pre and post op care of patients	Disagree	Disagree	Disagree	Nichols	Christopher		





Very familiar									
Very familiar	Disagree	Agree	Agree	Agree	Agree	Merrifield	Carol	Ann	
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar		Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Kathleen	Tubridy		
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				Self
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Disagree The applicants proposal is based entirely on commercial interests, not actual professional training and qualifications for the proposed practices (which by definition "naturopaths" do not undergo or possess). "Naturopaths" are not trained surgeons. The scope of "minor office procedures" is subject to arbitrary interpretation and creep, and can easily expand into full fledged undertakings of great danger to unwitting patients.	Disagree	Disagree See above.	Disagree The scope of naturopathic practice should be strictly limited to naturopathy - that's the whole point of naturopathy! Otherwise, go to medical school.				Myself
Somewhat familiar	Agree	Disagree Naturopathy does not cover fundamentals of medicine nor extensive postgraduate training that MD and DO must complete. To expand naturopath "physicians" expansion of practice would be devastating to the Washington people. People of Washington deserve to be treated by physicians who take an oath to do no harm and practice evidence based medicine by harnessing knowledge, extensive experience, ability to interpret medical studies, and continued education in his or her practice field as defined by their respective board.	Disagree	Disagree Excessively broad	Disagree				MD physician
Very familiar	Agree	Disagree	Disagree	Disagree Surgeons undergo three times the length of training that naturopaths do in order to perform many in office procedures. Surgeon training is also more relevant. It would be outright reckless and frankly dangerous to allow naturopaths to perform in office procedures	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				

Somewhat familiar	Agree								
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar									
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Cuono	charles		
Not familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree The education of a naturopath is insufficient to perform "minor office procedures" and this may be construed to apply to larger and more complex procedures - procedures in which no training has been obtained.	Disagree	Disagree	Disagree There is no formal surgical training in a naturopath's education. This is an unsafe proposal for patients who are unaware of their lack of surgical training.	Remington	Bradley		self
Very familiar	Disagree	Disagree Many many instances of harm caused by lack of							
Very familiar	Agree	Disagree Many many examples of harm caused by naturopaths lack of knowledge and experience	Disagree	Disagree	Disagree Again - I have concrete examples of harm with the clinical inexperience leading to extreme harm	Derek	Rodrigues		
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Ansari	Yasmeen		
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Dunn	Angela		
Very familiar	Agree	Disagree							
Somewhat familiar	Disagree	Disagree Naturopaths do NOT have sufficient enough training to perform in office procedures suggesting in the proposal. Allowing naturopathic providers this freedom would lead to an increase in unnecessary and potential very harmful procedures as they currently lack the skill and training.	Disagree There are not appropriate limits on these procedures. Allowing naturopaths to perform these procedures could lead to potential patient harm as they lack the appropriate oversight and clinical training to perform such procedures.	Disagree Needs more clarification and restrictions.	Disagree				Dermatologists
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				

					There is a lack of standardization for naturopath training. Allowing for this expanded scope of practice will put patients at risk.				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Pierce	Melinda		
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				concerned patient
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Hardaway	Christina		
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Opsahl	Michael		myself as an MD
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Not familiar	Neutral	Neutral	Neutral	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree				

		<p>Background: Bastyr grad; practiced 2012-2019; adjunct clinical supervisor at Bastyr X 1 year; private practice saw ~50% Medicaid patients. Issues with the requested scope expansions: Individual NDs may indeed have obtained additional training to help them competently handle these areas, but the naturopathic programs do not provide sufficient training to support the proposed scope expansion. For WA state, ND students have both classroom and clinical experience (depending on shift) in prescribing and managing the currently allowed controlled substances, testosterone and codeine (where the latter is still available for RX). They do not have clinical experience in managing the other controlled substances, though they may see patients who are on these substances (and managed by external providers). Significant additional training would be needed. As noted in the department's recommendation, primary care also includes the responsibility to know your limits and refer where appropriate. Minor surgery: training in WA is mainly classroom, at BCNH clinic minor surgery is not performed during clinical training except on one supervisor's shift/rotation. This is an *optional* shift for students. Students do not receive routine experience in this with patients, and are advised to obtain further training before performing it in practice. Those I know who perform minor surgery as NDs obtain significant additional supervised training with a provider who performs those procedures routinely, or have that experience through another license. Note that the request to broaden "minor surgery" to include "primary care procedures" could potentially be interpreted to include procedures such as laryngoscopy, which is not in our training. Signing all papers signed by physicians: Evaluating for guardianship: While NDs certainly do see patients who are</p>	<p>Other states require an additional exam in order to have this added to the license; or require that the ND practice in conjunction with, or be supervised by, an MD/DO/etc (not another ND) who has experience with these prescriptions. I also have grave concerns about the ability of the WA board of naturopathy to be able to evaluate and approve any needed training for these areas. See below.</p>	<p>"Minor office procedure" does not have a standard definition. The applicant definitely did not clearly define what they meant by "minor office procedure" let alone what they meant by "primary care procedures". They should clearly specify: what is involved? What are examples of the procedures they are referring to? What are the boundaries around what procedures would be included in this scope expansion? What type of training would normally be required, in terms of curriculum content and hours of hands-on practice (or number of procedures performed) under supervision. The same goes for "primary care procedures". What does that term include? What are the boundaries? How much training would an ND need?</p>	<p>Let me be up front: The board of naturopathy does not, in my opinion, have sufficient expertise to do more than regulate the current naturopathic scope of practice in WA state. And while not true of all board members, I have witnessed behavior on the part of some members of the board since 2018 that lead me to question if the WA BON should continue as a professional board, rather than being returned to advisory committee status. The applicant claims that naturopathic training Board members would need to document their training and relevant experience in each of these areas, and it should be at the least equivalent to that of other licensed healthcare providers who can handle these areas in WA state (MD, DO, potentially PA or ARNP). This would also require that future board members possess the relevant training and education for these areas of practice. While some NDs do, this is not a given. I have witnessed board meetings where one ND (no longer on the board) casually offered that based on his experience working with a urologist, he would train other NDs in how to perform a vasectomy. The response from the WA state urological association (also in attendance at a meeting) One concern is that in the last two years, the board of naturopathy was advised by Luke Eaton (from the WA AG office) that the board cannot rule what is or is not in scope. Individual practitioners must consult an attorney. The issue here is that the applicant references "in scope with naturopathic practice" as a guideline for what NDs will be able to do within the scope expansion. But who will then determine that? In the past it appears that someone made scope determinations for the profession, perhaps that was when the profession was regulated by an advisory board and the Secretary of the DOH made those decisions.</p>					
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Witherspoon ND	Lesley (Les)	H		Self 425 243 9405

		<p>Issues with the requested scope expansions: Individual NDs may have obtained sufficient additional training to help them competently handle these areas. However, the naturopathic programs do not provide sufficient training to support the proposed scope expansion. The applicant has not substantiated their claim that naturopathic medical program training is sufficient for the proposed scope expansion. At the least the applicant should provide the following, for each school: - The average number of patient contacts per student, per year, where the clinical experience includes actively managing the prescriptions, procedures, evaluations, or conditions in question, relevant to the proposed scope of expansion. - Detailed summary of the curricula relevant to the proposed scope of expansions, over the period of the last 10 years, with the number of classroom hours devoted to each area and the depth to which it is covered. As noted in the department's recommendation, primary care also includes the responsibility to know your limits and refer where appropriate. Controlled substances: for WA state, ND students have both classroom and clinical experience (depending on shift) in prescribing and managing the currently allowed controlled substances, testosterone and codeine. ND students however do not have clinical experience in managing the other controlled substances covered by the proposed scope expansion. For other states, the applicant needs to prove that students have sufficient patient contacts and instruction on managing these prescriptions. As of 2018 AZ NDs cannot Rx opioids (except perhaps morphine). This should include experience in managing patients on these substances in typical primary care practice. Minor surgery: training in WA is mainly classroom. Clinical experience with minor surgery can be obtained on only one shift/rotation, and is</p>	<p>Other states that allow controlled substance prescriptions require an additional exam in order for an ND to be able to Rx these controlled substances, or require that the ND practice in conjunction with, or be supervised by, an MD/DO/etc (not another ND) who has experience with these prescriptions. So far the WANP and the WA state naturopathic profession have not proposed scope expansions that include any guardrails, such as working with the medical commission and pharmacy board to establish training curricula, requiring any sort of training or supervision for NDs who have not been performing these procedures, restricting prescriptions in any way, requiring additional examinations to add these scope expansions to a license, or requiring any sort of collaboration with members of another healthcare profession who have experience in these areas.</p>	<p>"Minor office procedure" does not have a standard definition. The applicant definitely did not clearly define what they meant by "minor office procedure" let alone what they meant by "primary care procedures". They should clearly specify: what is involved? What are examples of the procedures they are referring to? What are the boundaries around what procedures would be included in this scope expansion? What type of training would normally be required, in terms of curriculum content and hours of hands-on practice (or number of procedures performed) under supervision. The same goes for "primary care procedures". What does that term include? What are the boundaries? How much training would an ND need? Note that the request to broaden "minor surgery" to include "primary care procedures" could potentially be interpreted to include procedures such as laryngoscopy, which is not in our training. Given that the board has been told that they cannot determine what is and is not in scope of naturopathic practice (per Luke Eaton WA AG office), it's unclear how anyone would determine whether or not a particular procedure would in fact be "in scope" for naturopathic doctors. The advice given at the time was to have individual NDs consult their attorney. This is not practical. The legislature would need to clearly list what procedures are now allowed.</p>	<p>The board of naturopathy does not have sufficient expertise to do more than regulate the current naturopathic scope of practice in WA state. They do not possess the experience to evaluate the needed training and education NDs would need to practice safely with the proposed expansion of scope. Current and potential board members would need to document their training and relevant experience in each of these proposed scope expansion areas. That experience would need to be equivalent to that of other licensed healthcare providers who have scope for these procedures, substances, and evaluations in WA state (MD, DO, PA or ARNP as appropriate). This would also require that future board members possess the relevant training and education for these areas of practice. Note that at this time, two board members are serving well past the expiration of their terms because no new ND board members have been approved. One ND board seat is empty. A public member seat has not been filled for years. Additionally, some members of the board appear unaware of how naturopathic training and skills compare with the standard training usually required for a particular medical procedure. At one board meeting I witnessed two naturopathic board members seriously discussing having one of the two (an ND) train other NDs in "how to perform a vasectomy". This was based solely upon that ND's prior experience in working with a urologist. Fortunately a urologist in attendance explained why this was not a good idea, and the board did not continue down that route. But while this lack of self awareness is not typical of all board members, it's a concern. Finally, there is the concern that based on the board's 2018 actions with regards to CME, the board of naturopathy does not prioritize medical education which is science-based and credible. NDs in WA state were mandated to take 1/3 of their biannual CME from a select group of naturopathic organizations, two of which had a past history of featuring material that was less than science based, such as a 2018 lecture on using homeopathy to respond to a pandemic. At this</p>				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Egrari	Sepehr		NA
	Disagree								
Very familiar	Unsure	Disagree	Disagree	Disagree	Disagree				I am a board certified physician
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				self (a practicing physician in
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree				
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree				
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree	Reese	Molly		American Medical

		<p>Overall, there is no assurance that a naturopathic graduate received a comprehensive, evidence-based medical education in their naturopathic program, and as such they do not have the underlying education necessary to support the scope expansions sought in the application. Further, naturopaths' clinical training is woefully insufficient. The naturopathic education does not prepare naturopaths with the skills necessary to provide the care sought in WANP's application. Medical education is built on science and evidence-based practice, but the same is not so clear when it comes to naturopathic education. The naturopathic curriculum, as set forth by the Council on Naturopathic Medical Education (CNME), lacks a high degree of standardization and is not rooted in the medical model. The curriculum and all coursework are guided by principles rooted in beliefs around the healing power of nature, vitalism, and the body's "healing wisdom"—principles that are not derived from evidence-based medicine. Many naturopathic therapeutics similarly lack a robust evidence base, yet these principles are integrated within every course in a naturopath's curriculum, and these treatment modalities continue to be taught and used as part of naturopathic practice. Naturopathic education focuses much of its attention on non-medical content. Naturopathic principles and therapeutics are combined with and taught alongside some coursework in sciences, but CNME standards supply no specifications around the number of course hours required in each area, and consequently, some graduates report completing the naturopathic program having taken only one course in topics like pharmacology. Even where a more robust pharmacological curriculum is ostensibly taught, there are no standards around course content, and the muddling of naturopathic principles</p>	<p>Washington would be an outlier should it grant naturopaths the expansive prescriptive authority sought by the applicant. Virtually all states that license naturopaths limit their ability to prescribe controlled substances, and at least 10 state statutes expressly prohibit naturopaths from prescribing any controlled substances at all. WANP's proposal would allow naturopaths to prescribe all controlled substances, including opioids, psychotropic drugs, stimulants, narcotics, and other powerful medications. This is a dangerous proposition. Controlled substances are controlled for a reason—because the risk of misuse of these drugs poses a threat to public health—and their prescribing should be done by physicians with the highest level of expertise. As the Department stated in their 2014 review of this very same proposition, "Referrals for controlled substances are often necessary to ensure the most qualified health care professionals are prescribing these substances, which are controlled because of their significant risks to public health due to overdose, abuse and misuse." To further indicate the risk, this proposal would open the door for naturopaths to prescribe psychotropic medications used to treat mental illness. These medications are serious: 18 of the 30 most-prescribed psychotropic medications carry "black box warnings," the U.S. Food and Drug Administration's most serious warning, which indicates the potential for series adverse reactions, including risk of death. The risk of complications only compounds when psychotropic drugs are used in combination with other medications or in the presence of comorbidities. Only health care professionals with significant training and a comprehensive medical understanding of all body systems should be permitted to prescribe these substances.</p>	<p>We are concerned about the proposed modification of the current "minor office procedure" provision, which would include "primary care services" and "procedures incident thereto of minor injuries" and broadly allow naturopaths to perform "injections." We fear that this proposal would open the door for naturopaths to perform surgery for which they are not trained. As proposed, the provision lacks the specificity necessary to establish guardrails that ensure the procedures performed by naturopaths are safe and within the limits of naturopaths' training. "Primary care services" and "procedures incident thereto of minor injuries" could mean surgery. Surgery is not something to be taken lightly, as there is no such thing as a minor surgical procedure, which is why the AMA believes only those licensed as a Doctor of Medicine (M.D.) or Doctor of Osteopathic Medicine (D.O.) who meet appropriate professional standards are qualified to perform surgery.</p>	<p>Washington law requires that the Board of Naturopathy be comprised of five licensed naturopaths and two members of the public, a composition of providers that does NOT ensure that Board members have sufficient expertise to evaluate what additional education and training is needed to safely expand the naturopathic scope of practice. Essentially, naturopaths in Washington are seeking authority to practice medicine despite the fact that they lack the requisite education and training to do so. The current composition of the Board essentially grants naturopaths the authority to self-regulate and expand their own scope of practice to include the practice of medicine without the input of allopathic physicians who are uniquely trained to perform minor office procedures and prescribe a broad range of medications. Practitioners who lack the requisite training to engage in the scope expansions they are considering should not have the authority to make determinations around what constitutes the appropriate naturopathic scope of practice.</p>				Association
Very familiar	Agree	<p>Disagree</p> <p>The AOA strongly opposes the notion that naturopathic programs meet the minimum education and training requirements necessary for such an expansion in scope. Unlike DOs and MDs, who undergo extensive medical education, clinical rotations, and residency training (totaling 12,000 to 16,000 hours of supervised postgraduate medical education), naturopathic physicians do not have a standardized, rigorous training program in pharmacology or clinical practice. The variability in naturopathic education, with some programs lacking comprehensive pharmacological training and clinical experience, is a major concern. This discrepancy is particularly troubling when considering the expansion of their scope to include prescribing controlled substances, which requires deep expertise to ensure patient safety.</p>	<p>Disagree</p> <p>The AOA disagrees that the applicant's proposal includes sufficient limits or safeguards. The AOA emphasizes that naturopathic physicians do not receive the same level of clinical training as DOs or MDs, especially in areas critical to the safe prescribing of controlled substances. Without equivalent education and training, the expansion of prescriptive authority could lead to significant risks, particularly in the context of the ongoing opioid crisis. The lack of standardized and rigorous pharmacological training for naturopathic physicians does not align with the necessary safeguards to protect public health.</p>	<p>Disagree</p> <p>The AOA expresses concerns regarding the breadth and depth of naturopathic training, particularly in relation to "minor office procedures." Given that there is no universal requirement for postgraduate residency training for naturopathic physicians, and many start practicing immediately after their four-year program, the AOA believes that naturopathic physicians may not be adequately prepared to perform even minor procedures safely. The variability in naturopathic education programs further exacerbates this concern, making it challenging to ensure consistent and sufficient training for these procedures across the board.</p>	<p>Disagree</p> <p>The AOA is skeptical about the Board of Naturopathy's capacity to adequately evaluate and determine the additional education and training required for safely expanding the naturopathic scope of practice. The AOA highlights that the current naturopathic training does not compare to the comprehensive education and clinical experience that DOs and MDs undergo, particularly in critical areas like pharmacology. This discrepancy raises doubts about whether the Board, as currently constituted, has the necessary expertise to assess and implement the appropriate training standards needed to ensure safe practice expansion.</p>	Schmidt	Bre		American Osteopathic Association
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	ROTCHFORD	JAMES	Kimber	

		If they can professionally diagnose and prescribe there should be no limits based on scheduling of drugs which is arbitrary. Federal oversight is problematic even for licensed medical physicians. The State should oppose federal/political policies that restrict state practice of medicine with limited accountability to patient outcomes. Any licensed practitioner must be held to standards of care and I'm confident that if a Naturopath was prescribing in a fashion that was not reasonable or prudent they would be held accountable. To argue safety one must balance the benefits vs risks. We are not going to stop physicians from admitting patients to hospitals because to do so is "risky". Naturopaths are professionals licensed to practice medicine ..let them do their work and a diversity of opinions by informed and educated professionals is beneficial for all.	As previously suggested I'm opposed to the federal restrictions based on scheduling of drugs as it relates to professional practices of medicine.	If based on training and experience we allow them to diagnose and prescribe, they must be prepared to evaluate their ability to safely and effectively provide minor office procedures. We need to expand access to indicated medical care, not limit it unduly. If a medical doctor behaves unprofessionally they can be held accountable. I assume the same goes for a naturopathic physician.	If they have the authority to assess education and training to diagnose and prescribe, how can one reasonably question their ability to define the scope of practice? As a medical doctor, I can legally perform brain surgery; however, it would be unprofessional for me to attempt to do so. I have no reason to believe that Naturopaths are less inclined to be professional in their care of patients than medical doctors.					
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Disagree									
Somewhat familiar	Agree	Disagree I am a plastic surgeon. Naturopaths ARE NOT ACTUALLY PHYSICIANS and they should NOT BE PERFORMING ANY PROCEDURES. If a naturopath wants to perform medical or surgical procedures they should go to medical school or go to medical school and then complete 7 YEARS OF RESIDENCY training after medical school like I did.	Disagree	Disagree	Disagree	Cooper	Joshua			
Very familiar	Disagree	Agree Naturopathic DOCTORS get more than sufficient education and training. We are after all, DOCTORS. Training and education has increased significantly to meet the modern demands of true prevention medicine and comprehensive care.	Agree The Board of Naturopathy, Bastyr University, and WANP have worked hard over the past several years to expand the education and experience to be above standards required by other states where naturopathic physicians have full prescriptive authority for controlled substances.	Agree The current proposal is archaic and does not take into consideration of the level of education and training that is required for licensure by NDs today.	Agree The Board of Naturopathy has been very carefully selected and voted into office by our community.	James	Christine			Sound Medical Weight Loss
Very familiar	Agree	Disagree they have no surgical training whatsoever	Neutral	Disagree minor office procedures - as a definition - is very vague. they need to have clear guidelines and should not be doing anything that an MD does.	Unsure these questions are worded in a very confusing way.					Plastic surgeon in WA state
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree	Brandling-Bennett	Heather			
Somewhat familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Agree	Disagree MDs and DOs go through extensive training and residencies to learn to safely prescribe risky medications and perform many procedures. This proposal is vague and does not clearly delineate a solid plan to ensure training is adequate for these areas of medical care	Disagree I very much worry about any initiative to expand prescribing authority of controlled substances, particularly level II. Without comprehensive training on safe prescribing, we risk worsening the opioid epidemic or increasing inappropriate stimulant prescriptions.	Disagree This proposal is vague in terms of what minor office procedures include. Again, the providers who do these procedures have hours of training in multiple training settings to learn procedural skills and competency in these topics.	Disagree					Family Physicians
Very familiar	Agree	Disagree there is insufficient training.	Disagree There are insufficient safeguards.	Disagree It is too vague.	Disagree	Shipowick	David	Glen		
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree					
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Very familiar	Agree	Disagree	Disagree	Disagree	Disagree					
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree					



Very familiar	Disagree	Agree	Agree	Agree	Agree					All Naturopaths across
Somewhat familiar	Agree	Agree	Agree	Agree	Agree					
Somewhat familiar	Disagree	Neutral	Neutral							
Very familiar	Agree	Agree								
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree	Lovins	Terri		Patient
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree	ENSON	Martha		Self
Very familiar	Agree	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar										
Somewhat familiar										
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree				
Not familiar	Disagree	Agree								
Somewhat familiar	Disagree	Agree I am a dietitian and work with many patients in private practice. I get to hear from them their experience w/their PCP and get GLOWING reports about their NDs and A LOT of disappointment from MDs and DOs. Whatever the training is (and it IS evidence based, despite the gross misreports of the opposition), it's working for patients.	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree									
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Agree	Loftis	Amy		
Very familiar	Agree	Agree highly informed	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Agree				



			<p>The department of health did not do their job and has totally failed at this Sunrise review. The department did not consider the applicant report or the education provided by the dean of Bastyr. There are so many inaccuracies in what the department put out, it is amazing. The department is alleging things about the Naturopathic profession that are not true with no citations and are bordering on slander. Every other profession is able to regulate itself and for the Department of Health to question the Board of Naturopathy is more than wrong. The department of health holds records of safety and disciplinary actions for all professions that they didn't even bother to look at before saying the naturopathic doctors are not safe. This is absolutely out of line and not acceptable. The Department of Health completely failed to do this sunrise review in an objective way. This sunrise review is full of so much bias it is incredible, unfounded bias at that. This is so different than past sunrise reviews and for no reason. The Naturopathic doctors are able to prove they have more education hours than nurse practitioners and other providers that have more scope and prescribing authority than they do. For the department to assess that they don't have enough education or training is just ridiculous. Safeguards come in rule making and is not really for the department of health to be assessing other than does their training make it safe for them to prescribe. There will be rules set forth during the legislative and rule making processes. I am extremely disappointed in the amount of bias in this survey and the sunrise review draft report.</p>						
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree								
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	<p>The Department of Health is completely out of line for asking this incredibly biased question. Naturopathic doctors have already been prescribing some controlled substances and adding a few more is not going to harm anyone. They are not going to go out and just start prescribing without training like the department is implying and the Board of Naturopathy is completely capable of regulating the profession. It is completely insulting to a Board within your department to be calling in to question their ability to regulate. They are doctors, the department is acting like they just graduated high school and have no additional education.</p>			
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	<p>I cannot believe the incredible bias in this survey. Every box should have a comment option and there should be a box for other comments that don't apply to these biased questions. The department of health is supposed to be taking public written comments. This survey is completely biased and should not have been used.</p>			
Very familiar	Disagree	Agree	Agree	Agree	Agree				

Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Wellz	Erika		
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				Self
		My naturopathic doctor has changed my life in addressing medical issues that my primary care physician could not. They are more than qualified!							
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Unsure				Myself as a patient.
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				Patient
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Forkasdi	Julie	Marie	
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				

Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Garbutt	Julie		Concerned citizen who utilizes NP
Very familiar	Disagree	Agree	Agree	Agree	Agree				Neighborhood Naturopathic
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree	Wonder	Michelle		myself
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				self
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree				
Not familiar	Agree	Unsure	Unsure	Unsure	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Agree	Agree	Agree	Agree				Self
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Agree	Agree	Agree	Agree	Agree	Forrest	Michelle		
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				
Very familiar	Disagree	Disagree	Disagree	Disagree	Disagree	Disagree			They don't even understand the proper questions to ask. How can insufficiently trained and uninformed practitioners judge their own?
Very familiar	Disagree	Agree	Agree	Agree	Agree				









Somewhat familiar	Disagree	Agree	Agree	Agree	Agree	Fairagan	Elizabeth		
Very familiar	Disagree	Agree I was sick with digestive issues for 5 years. I went to my PCP and then was under a gastroenterologist care. Neither solved my problem so I tried a naturopath. Within one month I was diagnosed and treated and have been helped tremendously by the naturopaths I've seen. My friend in Portland has just gone through 4 years of diarrhea. She went to her internist and then a gastroenterologist. The GI doctor told her it was just "Unexplained diarrhea!" My naturopath gave my friend a referral to a naturopath in Portland. Within 2 months she has been diagnosed with Microscopic Colitis. SIBO and she was so low in iron she needed infusions from the hospital!! In my experience, I trust naturopaths more than other doctors because they look at the whole person and do not give up until they find the root cause of the symptoms instead of just treating symptoms! I owe my health to my naturopath.	Agree	Agree	Agree They are very well trained and I trust them!	Perman	Kay	L	
Very familiar	Disagree	Agree	Agree	Agree	Agree				
Somewhat familiar	Disagree	Agree The comments submitted in opposition - with the majority of those comments coming in the form of a pre-written form letter were filled with misunderstandings and misinformation about the profession	Agree	Agree Yes as detailed in the report by WANP	Agree	Thompson	Laura		Patient of naturopathic care
Somewhat familiar	Unsure	Disagree	Disagree	Disagree	Disagree In my nearly 20 years of experience in medicine, I have not seen any evidence that naturopaths have sufficient skills, training, or quality control to provide any of the services they are currently applying for. I believe this request for increase in scope of practice would be dangerous and would pose significant risk of harm to patients who think they are seeing a properly trained medical professional.				
Somewhat familiar	Disagree	Agree	Agree	Agree	Agree				