Naturopathic Doctors are Primary Care Doctors

Naturopathic doctors (NDs) are trained and licensed to:

✓ Provide cost-effective patient-centered primary care services
✓ Practice family medicine
  o Naturopathic doctors see people of all ages and all conditions¹
  o Establish care with patients who do not have a prior history of care or a diagnosis
  o Manage ongoing primary care
✓ Diagnose and treat all acute and chronic diseases*
✓ Prescribe all legend drugs and Schedule III-IV drugs*
✓ Coordinate care and refer patients to work in tandem with specialists when appropriate (e.g., gastroenterologists and cardiologists)
✓ Prioritize prevention-oriented patient education in order to decrease the incidence of chronic diseases and keep health care costs down²
✓ Encourage health-promoting diet and exercise and use other behavioral counseling practices to improve patient outcomes and decrease the need for prescription medications³

NDs receive education comparable to medical & osteopathic doctors:

Figure 1: Years of postgraduate medical education

Figure 2: Average clinical hours by degree


**NDs use the same CPT codes for office visits & preventive services as other primary care doctors:**

<table>
<thead>
<tr>
<th>Description</th>
<th>Example Services</th>
<th>CPT Code(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manage ongoing primary care</td>
<td>Established patient well visit</td>
<td>99391-99397</td>
</tr>
<tr>
<td></td>
<td>Established patients</td>
<td>99211-99215</td>
</tr>
<tr>
<td>Establish care with patients who do not have a prior history of care or a diagnosis</td>
<td>New patient well visit</td>
<td>99381-99387</td>
</tr>
<tr>
<td></td>
<td>New patients</td>
<td>99201-99205</td>
</tr>
<tr>
<td>Order all labs, tests and imaging. Interpret labs and imaging reports. Perform CLIA-waived tests in-office*</td>
<td>Tuberculosis skin test</td>
<td>66580</td>
</tr>
<tr>
<td></td>
<td>Strep test</td>
<td>87880</td>
</tr>
<tr>
<td></td>
<td>Urinalysis</td>
<td>81000-81003</td>
</tr>
<tr>
<td></td>
<td>Occult blood test</td>
<td>82270</td>
</tr>
<tr>
<td></td>
<td>Pregnancy test</td>
<td>81025</td>
</tr>
<tr>
<td></td>
<td>Vaginosis profile</td>
<td>87205</td>
</tr>
<tr>
<td></td>
<td>ECG with interpretation</td>
<td>93000</td>
</tr>
<tr>
<td></td>
<td>Spirometry (lung test)</td>
<td>94010</td>
</tr>
<tr>
<td></td>
<td>KOH Prep</td>
<td>87220</td>
</tr>
<tr>
<td></td>
<td>Mono spot test</td>
<td>86308</td>
</tr>
<tr>
<td></td>
<td>Hgb A1C</td>
<td>83036</td>
</tr>
<tr>
<td></td>
<td>Glucose finger stick</td>
<td>94760</td>
</tr>
<tr>
<td></td>
<td>Hematocrit (blood test)</td>
<td>85014</td>
</tr>
<tr>
<td>Perform wellness exams, screening tests, and pap smears*</td>
<td>Annual physical exams</td>
<td>99381-99397</td>
</tr>
<tr>
<td></td>
<td>Pap smear</td>
<td>99385-99387, 99395-99397</td>
</tr>
<tr>
<td>Perform minor in-office procedures</td>
<td>Venipuncture</td>
<td>36145</td>
</tr>
<tr>
<td></td>
<td>Injection</td>
<td>96372</td>
</tr>
<tr>
<td></td>
<td>Anoscopy</td>
<td>46600</td>
</tr>
<tr>
<td></td>
<td>Removal of impacted earwax</td>
<td>69210</td>
</tr>
<tr>
<td>Repair and care for superficial lacerations and abrasions*</td>
<td>Superficial wound repair</td>
<td>12001-12019</td>
</tr>
<tr>
<td></td>
<td>Superficial wound treatment</td>
<td>12020-12021</td>
</tr>
<tr>
<td>Perform patient education and health counseling</td>
<td>Preventative medicine counseling</td>
<td>99401-99404, 99411-99412</td>
</tr>
<tr>
<td></td>
<td>Dietary counseling</td>
<td>97802</td>
</tr>
<tr>
<td></td>
<td>Smoking cessation counseling</td>
<td>99406-99407</td>
</tr>
<tr>
<td></td>
<td>Alcohol &amp; non-tobacco substance abuse screening</td>
<td>99408-99409</td>
</tr>
<tr>
<td>Order, administer and prescribe therapeutic devices, barrier contraception, and durable medical equipment*</td>
<td>IUD insertion</td>
<td>58300</td>
</tr>
<tr>
<td></td>
<td>IUD removal</td>
<td>58301</td>
</tr>
<tr>
<td>Prescribe and administer epinephrine*</td>
<td>Administer epinephrine</td>
<td>J0171</td>
</tr>
<tr>
<td></td>
<td>Administer diphenhydramine</td>
<td>J1200</td>
</tr>
<tr>
<td>Prescribe and administer natural and synthetic hormones*</td>
<td>Testosterone injection</td>
<td>J3150</td>
</tr>
<tr>
<td></td>
<td>Therapeutic, prophylactic, or diagnostic injection</td>
<td>96372</td>
</tr>
</tbody>
</table>

*Current scope of practice language taken from the Naturopathic Doctors Act (SB907) – B&P Code Division 2, Chapter 8.2.*
Half of all Americans live with a chronic medical condition. In California, 14 million people (38%) live with at least one chronic condition. Nearly 20% of the population has more than one chronic medication condition, accounting for 60% of the state's health care expenditures. In 2003, the total cost of managing these conditions was $133,000,000,000 for California alone. The California Health Care Foundation advises policymakers: "improving the quality and efficiency of chronic care delivery and effectiveness of prevention programs are crucial to improving the quality of life for millions of people and lowering the costs associated with chronic disease." 

Currently, Americans receive only half of the nationally recommended preventative services. The Affordable Care Act addresses this through initiatives and funding to promote preventative medicine; however, without a primary care workforce trained in health promotion and prevention, challenges will remain.

Studies have shown that cardiovascular disease, diabetes, and cancer are all preventable through lifestyle modification. Smoking and high blood pressure are responsible for the largest number of deaths in the US. Other dietary, lifestyle, and metabolic risk factors for chronic diseases (such as high blood sugar and cholesterol) for chronic diseases also cause a substantial number of deaths in the US.

Naturopathic doctors (NDs) are experts in prevention: NDs promote behaviors in their patients that foster health and reduce risk factors for chronic disease. Naturopathic doctors consistently encourage and teach the implementation of a healthy diet, regular exercise, health-promoting lifestyle and stress reduction strategies. The Look Ahead trials determined that healthy dietary changes recommended by primary care doctors were more likely to be implemented by frequent and expert delivery, which is what a patient can expect when under the care of a naturopathic doctor. Studies have found that patients are significantly more likely to discuss health maintenance and optimization with naturopathic doctors compared to medical doctors.

California Naturopathic Doctors: An Effective Solution for Chronic Disease Prevention

Diabetes Prevention: 33% of males and 39% of females born in California in 2000 are expected to develop diabetes during their lifetimes.

- Research shows that naturopathic medicine improves blood glucose control, patient self-management behaviors, and self-efficacy among patients with diabetes.
- Naturopathic doctors address lifestyle modification (dietary recommendations, exercise prescriptions and stress reduction techniques) with 69-100% of their diabetic patients.
- Patients under an ND’s care are 17% less likely to develop metabolic syndrome than those in conventional care.
- Lifestyle change is superior to early metformin for the prevention of diabetes. Lifestyle interventions delay the onset of diabetes by 11 years, while metformin therapy delays the onset of diabetes by 3 years in those with impaired glucose tolerance.
- Lifestyle modification program is cost-effective in all adults, while metformin is not cost-effective after age 65.
- A lifestyle intervention program prevented 37% of expected cases of diabetes over 15 years at a cost of $1288 per QALY. Private insurer investments showed recovery of costs through medical expenses avoided after 3 years.

Heart Disease Prevention: 57% of Californians over age 65 have been diagnosed with high blood pressure (BP). Healthcare costs for Californians with heart disease are 6 times greater than average.

- High-risk patients receiving naturopathic care can reverse hypertension without expensive medication: research shows drops of 26mmHg in systolic BP and 11mmHg in diastolic BP in 6 months.
- Less than 50% of conventional care patients with high blood pressure receive lifestyle counseling despite clear industry guidelines, while 97% of patients under the care of a naturopathic doctor receive lifestyle counseling.
- A randomized clinical trial showed that naturopathic medicine resulted in a 3.3% reduction in the 10-year Framingham cardiovascular event risk, equivalent to gaining 5.5 years of active life.
- Lifestyle change is the only intervention proven to reverse coronary artery disease.

Asthma Symptom Management and Treatment: Total charges for asthma hospitalizations in 2005 in California were $763 million. Only 33% percent of adults and 39% of children with asthma received asthma management plans from a health care provider in 2005.

- An international study of 50,000 school children found that greater consumption of fruit, vegetables and fish was associated with lower incidence of wheeze and asthma symptoms.
- Another study found that nuts, fresh fruit and vegetable consumption decreased wheeze and rhinitis.
- A Johns Hopkins epidemiological review found significant evidence that antioxidant vitamins, particularly vitamin C and vitamin E, and omega-3 fatty acids modulate the progression of chronic lung diseases and chronic obstruction pulmonary disease in both children and adults.
- Increasing evidence supports numerous naturopathic treatments for both the prevention and treatment of chronic lung conditions, including the use of fish oil supplements, magnesium for acute symptoms, and nebulized glutathione.
- NDS incorporate both naturopathic and conventional modalities when treating asthma, including prescription inhalers and drugs as appropriate.

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"Active health promotion counseling and an emphasis on self-care form the foundation for naturopathic medicine… Naturopathic doctors identify the individual barriers to change that a patient faces and then emphasize practical solutions for fitting behavior modification techniques into a busy lifestyle.”

--Ryan Bradley, ND, MPH

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The Value of Naturopathic Medicine in California:
Cost Effective Primary Care for Disease Prevention and Health Improvement

Naturopathic medicine is a whole medical system defined by its philosophy that includes health promotion, disease prevention and health care education for patient empowerment. Studies from Washington State show naturopathic medicine costs insurers and consumers less than conventional care. Patients utilizing naturopathic medicine report much higher patient satisfaction and health improvement, as compared to conventional care. Naturopathic Doctors (NDs) are already providing cost-effective primary care – inclusion in essential benefits packages will expand access and help solve the current California health care shortage crisis.

What Does Naturopathic Medicine Cost?

High Quality Care at Low Cost

- Analysis on the impact of Washington State’s 1996 Every Category of Provider law found that the “impact [of including naturopathic doctors] on premiums was modest – generally less than 2%.”
- After 6 years of insurance coverage of ND Primary Care Providers (PCPs) in WA state, visits to NDs made up just 1% of all outpatient provider visits but accounted for only 0.3% of the dollars paid out by insurers.
- Naturopathic doctors delivering the same Medicaid services in Oregon are 57.5% more cost effective than MD/DO/NP PCPs providing the same services.
- A Washington study found that 67.7% of patients who receive naturopathic care do not receive concurrent care from an MD/DO: naturopathic care is not “add-on” medical care in the majority of cases.
- Evidence shows that Naturopathic doctors treated 7 of the top 10 most expensive health conditions more cost-effectively than MDs or other conventional providers.

Naturopathic Medicine for the Prevention of Type 2 Diabetes

- The Diabetes Prevention Trial demonstrated that the prevention of type 2 diabetes by diet and lifestyle therapies was more cost effective than pharmaceutical therapy in high-risk patients.
- For each quality-adjusted life years (QALY) saved, a lifestyle modification program costs $8,800 while metformin therapy costs $29,000. Additionally, the lifestyle modification program was shown to be cost-effective in all adults, while metformin was not cost-effective after age 65.
- Naturopathic doctors are experts in guideline-directed, evidence-based lifestyle modification for diabetes. Four studies to date have demonstrated improvements in blood sugar control among patients working with NDs. Additional benefits of the treatment included weight loss, lower blood pressure, and less depression.

6 The Cost Effectiveness of Naturopathic Delivery of Oregon Medicaid Services Statistics provided by Leslie Hendrickson, Office of Medical Assistance. Feb 11, 1991
8 Henry, Geoffrey C., Alternative Health Care Consultant, King County Medical Blue Shield (KCMBS), Phase I Final Report: Alternative Healthcare Project, 1995
Naturopathic Medicine Reduces Cardiovascular Disease (CVD) Risk

- CVD is the leading cause of death in the United States and is associated with high direct medical costs and indirect costs, e.g. loss of productivity.\(^\text{11}\)
- A recent study has shown that one year of care under the supervision of a naturopathic doctor resulted in a 3.07% reduction in 10-year CVD event risk compared to patients receiving only conventional care.\(^\text{12}\)
- The same study found that after one year, naturopathic patients were 16.9% less likely to have developed metabolic syndrome that conventional care patients.\(^\text{12}\)
- A university meta-review of studies on the impact of diet on cardiovascular health concluded that “changes in dietary habits are generally cost-effective, and the means are widely available. Through heightened attention of health professionals and the public to current data on appropriate nutritional practices, better measures can be adopted to help reduce cardiovascular risk at a public health level.”\(^\text{13}\)

Naturopathic Medicine Improves Lower Back Pain and Other Musculoskeletal Complaints, Getting People Back to Work at Lower Costs

- Ineffective pain care cost U.S. employers $297.4 to $335.5 billion in lost productivity in 2010.\(^\text{14}\)
- A randomized controlled trial found significant decreases in pain and increases in range of motion in workers who received naturopathic care versus usual care. Quality of life also improved (p<0.0001).\(^\text{15}\)
- A randomized controlled trial of rotator cuff tendinitis found reduced pain (p<0.001) and less disability (p=0.0002) among postal workers treated by naturopathic doctors compared to usual care.\(^\text{16}\)
- From the perspective of the employer, the inclusion of naturopathic care in an essential benefits package could avoid $172 per day of lost productivity at a cost $154 per absentee day avoided, equal to a return on investment (ROI) of 7.9%.\(^\text{17}\)
- Compared to conventional physiotherapy, naturopathic care was associated with improvements in symptoms and quality of life, as well as a decrease in costs of $1,212 per study participant. Workplace absenteeism was also reduced by 6.7 days per year.\(^\text{17}\)

\(^{16}\) Naturopathic Treatment of Rotator Cuff Tendinitis Among Canadian Postal Workers: A Randomized Controlled Trial. Arthritis & Rheumatism (Arthritis Care & Research), Vol. 61, No. 8, August 15, 2009, pp 1037–1045.
Increasing demand and decreasing supply leaves 5 million Californians without care mandated by the ACA

Expanding coverage without taking simultaneous steps to address primary healthcare shortages can have unintended and costly consequences.1 As seen in Massachusetts:

- After enacting statewide health reform in 2006, the 158,000 newly insured residents quickly overwhelmed the state's supply of primary care doctors.2
- From 2009-2010, there were almost 100,000 more visits to safety net hospitals, leading to a $70 million shortfall for providers that year.2
- These access problems occurred even with the highest primary care physician-to-population ratio in the nation.2

- A university study found that California will have the worst shortage of primary care providers of all states: expected 3,334 more needed to meet the coming demand.1
- Only 34% of active physicians reported practicing primary care in California in 2012.
- Future MDs are not enough: there has been a 51% decline in family practice from 1998-2006.1

Health and financial implications of lack of access to Primary Care Providers (PCPs)

Evidence suggests that a further reduction of primary care services will inevitably lead to a worsening of health outcomes, a widening of health disparities, and a rising cost of healthcare.1

- A 2007 study found that one-third of all Emergency Department (ED) visits are “avoidable,” meaning treatable in primary care settings.3
  - ED charges for minor, non-urgent problems may be 2 to 5 times higher than charges for a typical private doctor office visit.3
  - The study found that reliance on the ED is likely due to lack of a primary care provider and longer waiting times for doctor appointments.3
- In 2006, California spent over $1.8 billion on avoidable ED visits.3

NDs are already filling the gap as trained and licensed PCPs

- California Business & Profession code Section 3613(c): “Naturopathic medicine’ means a distinct and comprehensive system of primary healthcare practiced by a naturopathic doctor for the diagnosis, treatment, and prevention of human health conditions, injuries, and disease.”
  - NDs are the only PCPs trained extensively in counseling, nutrition, exercise and stress management, enabling them to fully address modifiable risk factors for chronic disease.
  - Naturopathic doctors use the same CPT codes for office visits and preventive services as other PCPs.
    - Adding NDs to PCP panels does not add new services.
      - NDs in CA are able to prescribe all legend and Schedule III-IV drugs.
- The number of naturopathic doctors in the US and Canada increased by 91% from 2001-2006.4
- Bastyr University recently opened a San Diego campus to further increase the supply of NDs in CA.

Cost Effectiveness

- Evidence shows that Naturopathic doctors treated 7 of the top 10 most expensive health conditions more cost-effectively than MDs or other conventional providers.\(^6\)

- Naturopathic doctors delivering the same Medicaid services in Oregon are 57.5% more cost effective than MD/DO/NP PCPs providing the same services.\(^7\)

Patient Satisfaction

- The Puget Sound Health Alliance conducted a 2012 study on patient satisfaction in 156 clinics. Bastyr Center for Natural Health, a naturopathic clinic, ranked #1 in the following categories:
  - “How well providers communicate with patients” & “Getting timely appointments, care and information.”\(^8\)

Naturopathic Medicine is increasingly covered by other states’ insurance plans and federal programs

- Washington: as of 1995, all health care plans must include every category of licensed provider.
- Vermont: as of 2007, all insurance companies must reimburse for ND services in the same way and to the same extent that they reimburse for the services of any physician.
- In 2012, the Indian Health Services included Naturopathic doctors in the federal loan repayment program.

<table>
<thead>
<tr>
<th>State</th>
<th>Insurance Carriers(^9)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alaska</td>
<td>Aetna, Blue Cross/Blue Shield, Premera, United Healthcare, +</td>
</tr>
<tr>
<td>Arizona</td>
<td>Aetna, Blue Cross/Blue Shield, Cigna, Humana, Lumenos, United Healthcare</td>
</tr>
<tr>
<td>Connecticut</td>
<td>Aetna, Anthem, Connecticare, United/Oxford, Cigna, Healthnet, +</td>
</tr>
<tr>
<td>Maine</td>
<td>Aetna, Anthem, Cigna, +</td>
</tr>
<tr>
<td>Montana</td>
<td>Blue Cross/Blue Shield, Children’s Health Insurance Plan, Allegiance Healthcare, New West Health Insurance, Montana Association of Counties, Great West, MUST +</td>
</tr>
<tr>
<td>Oregon</td>
<td>Medicaid, Aetna, ASHN, Assurant, Blue Cross/Blue Shield, Care Oregon, CHP, Cigna, Family Care, Great West, Health Net, Kaiser, Lifewise, My Optum, ODS, OHP, Open Card, Pacificare, Pacific Source, Providence, Regence, Reliant Behavioral Health, United Healthcare, +</td>
</tr>
<tr>
<td>Vermont</td>
<td>Medicaid, Blue Cross/Blue Shield, Cigna, Catamount, Dr. Dynasaur, MVP Health Care, Vermont Managed Care, VHAP, +</td>
</tr>
<tr>
<td>Washington</td>
<td>Aetna, Blue Shield/Blue Cross, CIGNA, First Choice, Group Health, Uniform Medical, United Healthcare, Pacificare, +</td>
</tr>
</tbody>
</table>

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\(6\) Henny, Geoffrey C., Alternative Health Care Consultant, King County Medical Blue Shield (KCMBSS), Phase I Final Report: Alternative Healthcare Project, 1995.

\(7\) The Cost Effectiveness of Naturopathic Delivery of Oregon Medicaid Services Statistics provided by Leslie Hendrickson, Office of Medical Assistance. Feb 11, 1991.


Why is Patient Experience Important?

- “Patient experience” refers to what happens to people when they are interacting with the health care system and trying to have their needs met.
- Patients satisfied with their experiences are more compliant, have better follow-up, have better disease outcomes, and help insurers meet benchmarks for Consumer Assessment of Healthcare Provider and Systems (CAHPS) accreditation.¹

Examples of Patient Experience Indicators:

- Does the patient feel listened to?
- Does he or she understand explanations about his or her health issues and important instructions about recommended care?
- Does the patient have the ability to get timely information in response to questions about his or her health concerns?

What can a patient expect from a visit with a naturopathic doctor?

Naturopathic practice is distinguished by treatments individualized to a patient’s physical condition and environmental circumstances, requiring combination therapies adjusted over time as guided by patient response. In addition to conventional treatments, modalities most often used in naturopathic practice include clinical nutrition and dietary revision, counseling for lifestyle modification (such as smoking cessation and increased exercise, botanical medicine), homeopathy, physical medicine, and mind-body therapies.²

Patients get more time with their naturopathic doctor.

Better patient outcomes are generally associated with longer consultation times.³

- The average ND visit is 40 minutes, while the average MD visit is 15-17 minutes.⁵
- Currently, 75% of all healthcare expenditures are spent on the nearly 50% of all Americans living with at least one chronic condition. For chronic cases with no easy fix, time matters.⁴

Research increasingly shows that patients are more satisfied with NDs.

Evidence shows that the quality of the physician-patient interaction influences treatment outcomes.⁷

- Bastyr Center for Natural Health, a health clinic affiliated with an accredited naturopathic medical university, ranked #1 of 156 health clinics in an independent Puget Sound survey on patient experience.¹
- The Bastyr Center ranked #1 in the categories of “How Well Providers Communicate with Patients” and “Getting Timely Appointments, Care and Information.”
- Naturopathic clinics outperformed conventional clinics in each survey category (Figure 1).

![Figure 1. Results from 2011 Puget Sound Survey](image)

Naturopathic Doctors Offer Comprehensive Care

“I think one difference is, my medical doctor seems to want to manage symptoms. And the [ND] wants to get kind of to the bottom of things, take all the layers off to get to and address the root issue.” (PLoS 2012)

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⁵ JABFP Nov-Dec 2002, Vol 15, No.6 pg 467
NATUROPATHIC DOCTOR
SAFETY STATISTICS

In 2013, the federal government acknowledged the safety and effectiveness of naturopathic medicine by passing a resolution designating the week of October 7-13 as Naturopathic Medicine Week to “recognize the value of naturopathic medicine in providing safe, effective, and affordable health care.”¹ The California and nationwide data undeniably support the US government's 2013 resolution.

California’s nearly 500 practicing naturopathic doctors have a pristine safety record — there have been no cases of patient harm caused by naturopathic doctors in California since licenses were first issued in 2005.

Throughout the US, naturopathic doctors have maintained an excellent history of patient safety. In Washington, a state that began licensing NDs in the 1930s and has a broad scope of practice that includes minor office procedures and independent prescription rights, has had only 25 disciplinary actions against naturopathic doctors in the last 10 years. This represents 0.5% of the ND population in Washington. During the same time period, there were 23,317 disciplinary actions taken against medical doctors, representing 0.64% of Washington MDs. Osteopathic doctors were also cited more frequently than NDs; there were 56 actions against DOs from 2001-2011, representing 0.95% of the population – nearly double the rate of naturopathic doctors.² Other states with broad scopes of practice for NDs boast similar rates.

Malpractice insurance claims can be used to further assess the risk of updating the scope of practice for naturopathic doctors in California. According to NCMIC, the leading provider for naturopathic malpractice insurance, premium rates for naturopathic doctors average approximately 30-40% lower than primary care medical doctors. Furthermore, NCMIC has never opened a claim based on an allegation against a naturopathic doctor involving prescription medications. Bruce Beal, Vice President of Claims at NCMIC, wrote the following in a 2010 letter:

“[NCMIC] entered into the ND market in 2001 offering [malpractice] coverage to NDs in all states that recognize and license the profession. I believe that to be 15 states plus the District of Columbia at the present time. In addition, NCMIC insures four of the five naturopathic colleges in the United States.

In the years that NCMIC has been insuring Naturopathic Doctors and the colleges, we have never opened a claim based on an allegation against a Naturopathic Doctors involving prescription medications. We have seen several claims involving adverse reactions to herbals or a combination of herbals reacting with a drug prescribed by a medical doctor.”

The National Practitioner Databank, a statistical database maintained by the US Department of Health and Human Services, has no records of malpractice claims against naturopathic doctors in the United States. According to the Databank, there were 16,925 malpractice payments made in California from 2002-2012, amounting to more than $2.7 billion. None of those malpractice payments were attributed to naturopathic doctors. A 2013 nationwide search by Verdict-Search also found no records of malpractice suits against naturopathic doctors.

Safety is an important factor to consider when new legislation is being proposed. Based on the national safety data, updating the Naturopathic Practice Act (SB907) to enable California NDs to practice to the full extent of their training and education will increase patient access to safe, effective primary care.