



April 9, 2023

The Honorable Marc Berman, Chair
Assembly Business and Professions Committee
1020 N Street, Room 379
Sacramento, CA 95814

Re: AB 765 (Wood) – **Oppose unless Amended**

Dear Assemblymember Berman:

Since its creation, the California Board of Naturopathic Medicine (Board) (formerly known as the Bureau of Naturopathic Medicine – 2003, and later Naturopathic Medicine Committee – 2009), is responsible for the licensure and enforcement of Naturopathic Doctors (ND). During this time of licensure, the NDs were prohibited from using the term naturopathic physician (which is used in other regulating states for naturopathic medicine) and there was a concession made that allowed individuals licensed under the Board to use the title “doctor” (ND) instead of “physician”. Since that time, NDs have used the title without any harm or confusion to consumers.

NDs are licensed primary care doctors in California who diagnose, prevent, and treat acute and chronic health conditions and focus on prevention. NDs attend four-year accredited naturopathic medical schools recognized by the U.S. Department of Education. NDs are trained in the same medical sciences as allopathic (MDs) and osteopathic (DOs) doctors. NDs incorporate natural medicines in combination with conventional treatments. NDs work in collaboration with other health care professionals and are trained to know when to refer their patients to medical specialists or other healing arts providers.

AB 765 would prevent Naturopathic Doctors from referring to themselves by terms and titles provided to them and protected within their statute (California Business and Professions 3610 – 3686). This bill would additionally create prohibitions banning NDs who are also Board-Certified with specialty associations from utilizing their Board Certifications in their titles, such as FABNO (Naturopathic Oncologist), FABNP (Naturopathic Pediatrician). The Board currently monitors and would take action on a licensee who uses a board-certified title without being certified through the respective specialty

association. To date, the Board has not had to act against any ND for this type of violation. However, we know that this is not true for MD and DOs who often use the board-certification title although they are not board certified.

Further, there is no evidence of patient confusion or safety risk, nor is there any evidence showing harm due to the lack of clarity in provider identification between, NDs and their MD and DO colleagues. However, this bill would certainly add risks associated with the naturopathic doctor title versus the unlicensable "naturopathic practitioner", who does not meet the training and educational requirements to become a naturopathic doctor. California BPC §3645 allows the terms "Naturopath", "Naturopathic practitioner", and "Traditional naturopathic practitioner" to be used by certain unlicensed individuals. These individuals may not use the "doctor" or "ND" titles. If AB 765 is successful without making any amendments, it will be impossible for consumers to distinguish between a licensed and regulated ND or an individual without the standardized training, education, and examinations in place.

For these reasons, the California Board of Naturopathic Medicine **strongly opposes** AB 765 unless amended to exclude NDs from the proposed language.

Respectfully Submitted,



Rebecca Mitchell
Executive Officer, California Board of Naturopathic Medicine

Cc: Members, Assembly Business and Professions Committee
The Honorable Jim Wood, Assembly Member