



**NATUROPATHIC MEDICINE COMMITTEE  
IV THERAPY SUBCOMMITTEE  
MEETING MINUTES**

**May 6, 2019**

**MEMBERS  
PRESENT:** Dara Thompson, ND, Chair  
Vera Singleton, ND  
Virginia Osborne, ND

**MEMBERS  
ABSENT:** None

**STAFF  
PRESENT:** Rebecca Mitchell, Executive Officer (EO)  
Sabina Knight, Esq., Legal Counsel  
Salwa Bojak, Esq., Legal Counsel

**MEMBERS OF  
THE AUDIENCE:** None

**Agenda Item 1 Call to Order/Roll Call/Establishment of a Quorum**

Dara Thompson, ND, Chair, IV Therapy Subcommittee of the Naturopathic Medicine Committee (NMC), called the meeting of the IV Therapy Subcommittee to order on May 6, 2019, at 12:06 p.m. A quorum was present and due notice was provided to all interested parties.

**Agenda Item 2 Public Comment for Items Not on Agenda**

There were no public comments for any items not on the agenda to discuss.

**Agenda Item 3 Discussion and Possible Recommendations Regarding IV Therapy Regulations:**

Dr. Thompson reiterated the purpose of the subcommittee is to review education and training of naturopathic doctors (NDs) and make a recommendation to the full Committee on potential regulation creation to ensure proper training and education are met for the safe use of IV therapies.

Items that will be reviewed by the subcommittee members include; the education and training of accredited naturopathic schools, current standards for IV therapy practiced in

other states, and the scope, safety and efficacy of naturopathic medicine on a national level.

Rebecca Mitchell, Executive Officer (EO), reported that resources to assist in the review process were included in the meeting materials. These materials included:

- Original 2007 Findings and Recommendations Regarding the Prescribing and Furnishing Authority of a Naturopathic Doctor – presented to the California State Legislature on 1/1/2007, which included the original IV therapy blueprint that was used to create IV therapy legislation. [Business and Professions Code section 3640.8]
- Information on the national education requirements for becoming licensed NDs.
- Association of Accredited Naturopathic Medical Colleges (AANMC) Core Competencies of the Graduating Naturopathic Student.
- Copy of Business and Professions Code section 3640.8 which outlines the current requirements to become certified to perform IV therapy with the Committee.
- Standards of practice for IV therapy (Oregon Board of Naturopathic Physicians).
- Scope of Practice for all naturopathic medicine regulating authorities (RAs), including IV therapy. This shows that 9 other RA states, including neighboring states of Oregon, Washington, and Colorado, have a full scope for performing IV Therapies natural/IV Legends.
- Distribution of licensee populations and medically under-served areas/populations, which shows 15% of licensed NDs in CA work with medically under-served populations (MUP) and 58% of licensed NDs in CA work in medically under-served areas (MUA). This helps bridge the gap for healthcare barriers but could do a lot more if NDs in CA were able to practice-as-trained and work at the full primary care practitioner level.

**a.     *Education and Training***

EO Rebecca Mitchell, reported information on the education and training stating that a licensed ND attends a four-year, graduate-level naturopathic medical school and is educated in all of the same basic sciences as an allopathic/osteopathic (MD/DO) physician, but also studies holistic and nontoxic approaches to therapy with a strong emphasis on disease prevention and optimizing wellness. In addition, to a standard medical curriculum, the naturopathic physician (ND) also studies clinical nutrition, homeopathic medicine, botanical medicine, psychology, and counseling. An ND takes rigorous professional board exams so that he or she may be licensed by a state or jurisdiction as a primary care general practice physician.

The American Association of Naturopathic Medical Colleges (AANMC) was established in February 2001 to propel and foster the naturopathic medical profession by actively supporting the academic efforts of accredited and recognized schools of naturopathic medicine. AANMC offers seven (7) accredited naturopathic medical programs and eight (8) campus locations in North America.

The North American Board of Naturopathic Examiners (NABNE) is an independent, nonprofit organization formed as a service to the naturopathic profession and the agencies that license/register naturopathic physicians. NABNE serves regulating authorities by qualifying applicants to take the Naturopathic Physicians Licensing Examination (NPLEX). All license applicants must pass both parts of the NPLEX exam to meet licensing requirements in any of the regulating states.

**b. *Standards of Practice for IV Therapy of Naturopathic Doctors***

Current standards for neighboring states show that both legend and natural supplements are allowed within ND scope. Additionally, these standards should be used to assist in the promulgation of regulations to allow safe practices.

**c. *Consultant Findings: Prescribing Rights of Naturopathic Doctors from other States***

Per data collected from all naturopathic medicine regulating authorities (RAs), 14 of the 22 RA states; including neighboring states of Oregon, Washington, and Colorado, have a full scope when it comes to prescribing or furnishing legend drugs independently, without supervising physician oversight.

California consumers are complaining to the Committee that it is not fair that they cannot get the same naturopathic medical care in California that they get in neighboring states.

**d. *Current Formularies in California***

Copies of two current reports issued by the prior Formulary subcommittee (2015) were provided to the current subcommittee. These reports echoed the original recommendations provided in the 2007 report. Similar recommendations were provided in the 1/27/2014 Formulary Subcommittee Report to the Naturopathic Medicine Committee, along with an addendum to the 2014 report issued on 02/23/2015.

The recommendation in short was to eliminate physician oversight. Furthermore, it was recommended that NDs should independently be allowed to prescribe all legend drugs and scheduled drugs 3-5, with the exclusion of schedule 1 and 2 drugs.

**e. Distribution of Licensee Population and Underserved Areas**

Based on current California licensed ND population data pulled from BreEZe (Committee's licensing system), 15% of licensed NDs work with medically underserved populations (MUP) and 58% of licensed NDs work in medically underserved areas (MUA).

**Agenda Item 4 Establish Timeline for Subcommittee Work and Recommendations**

A timeline for the legislative cycle was provided so the subcommittee can work within appropriate timelines. Per staff and legal, the recommendations to the full Committee should be available by the 2019 year-end in order to meet the next legislative session (2020).

**Agenda Item 5 Establish Future Meeting Dates and Locations**

- 2<sup>nd</sup> IV Therapy Subcommittee Meeting – MON JUL 15, 2019 (12 pm – 1 pm)

**Agenda Item 6 Agenda Items for Future Meetings**

The following are items that were requested to be added to future meetings:

- Confirm legislative calendar dates for 2020 legislative session
- Malpractice Insurance Data for ND (national statistics) – comparisons of ND and allopathic/osteopathic physicians
- Clarify which courses must be completed prior to IV therapy certification
- Clarify chelation use via IV therapy
- Clarify Ozone use via IV therapy
- IV Therapy certification renewal periods
- Advanced IV therapy treatments

**Agenda Item 16 Adjournment**

***There being no further business or public comment, Dr. Thompson adjourned the meeting at 12:55 p.m.***