Dara Thompson, ND

Dr. Thompson received her bachelor’s degree in biology from the University of California at Santa Cruz and her doctorate in naturopathic medicine from The National College of Naturopathic Medicine in Portland, Oregon. After 5 years of clinical practice she completed a 1-year post-graduate training in Environmental Medicine. Dr. Thompson taught Anatomy and Physiology as well as Clinical Nutrition at the Hawaii College of Oriental Medicine for 9 years.

Dr. Thompson currently practices at Azzolino Chiropractic Neurology and Integrative Wellness in San Francisco. In this dynamic setting, she enjoys active collaboration with medical doctors and chiropractors. Dr. Thompson has been in practice since 2002 and her passion for medicine continues to grow. She combines the foundations of naturopathic medicine with her knowledge of environmental influences and genomic analysis to find solutions for complex medical conditions.

Dr. Thompson is currently the Chair of the Naturopathic Medicine Committee.

Dr. Thompson was appointed to the Committee by former Governor Brown in December 2015.

Rebecca Mitchell

Ms. Mitchell started her career with the State of California in 1997 with the California Highway Patrol, Office of Research and Planning. In 2006, Ms. Mitchell became the Executive Program Analyst for the Osteopathic Medical Board where she stayed until her appointment as the Executive Officer of the Naturopathic Medicine Committee in 2013. With nearly 25 years of training and experience in state finance, high-level administration, and analytical work, Ms. Mitchell continues to provide knowledgeable leadership to the Committee.

Since 2016, Ms. Mitchell also serves as the Secretary on the Board of Directors with the Federation of Naturopathic Medicine Regulatory Authorities (FNMRA), where she further assists in public protection by connecting regulatory authorities and promoting standards of excellence in the regulation of naturopathic medicine in North America.
Topics of Discussion

• What is Naturopathic Medicine
• What are Naturopathic Doctors (ND)
• Education of Naturopathic Doctors
• Safety Records
• Unlicensed Practice (naturopaths)
• Malpractice
• Formularies
• Scopes
What is Naturopathic Medicine?

- Naturopathic Medicine is a distinct and comprehensive system of primary health care that uses primarily natural methods and substances to support and stimulate the body’s self-healing process.

- In 2005, California became the 13th state to regulate and license naturopathic doctors.

- Currently 22 states, the District of Columbia, and the US territories of Puerto Rico and the US Virgin Islands have licensing laws for naturopathic physicians. There are 10 states pending regulation in 2020, and 9 other states filing regulatory bills in 2020-21.

- In most of the other licensing states and territories, NDs are titled as naturopathic physicians.
Naturopathic Philosophy

- First, Do No Harm
- Identify and Treat the Cause
- Doctor as Teacher
- Treat the Whole Person
- Prevention

What are Naturopathic Doctors (ND)?
Naturopathic Doctors

Naturopathic Doctors are trained in a wide variety of primary care, complementary and alternative therapies, including:

- Conventional Medications and Drugs
- Minor Office Procedures
- Childbirth Attendance
- Hormone Replacement Therapies
- Herbal and Homeopathic Medicines
- Clinical Nutrition and Diet
- Vitamins, Amino Acids, Minerals, Enzymes, and Nutraceuticals
- Physical Medicine such as Massage, Exercise Therapy, orthopedic assessment, Physiotherapy and Hydrotherapy
- Counseling and Behavioral Therapies
- Health and Lifestyle Counseling

Education of Naturopathic Doctors
Naturopathic Education

- Must have a Bachelor’s Degree from a regionally accredited college or university prior to admittance to a naturopathic college.
- ND Degree or diploma of a minimum 4,100 total hrs. in basic and clinical sciences, naturopathic philosophy, naturopathic modalities, and naturopathic medicine.
- Not less than 2,500 hrs. shall consist of instruction.
- Not less than 1,200 hrs. shall consist of supervised clinical training.
- NDs are clinically trained in both natural and conventional approaches to medicine.
- NDs are required to complete at least 72 hrs. of pharmacology course hours in school and must complete a minimum of 20 hours of pharmacotherapeutic training every two years of their continuing education requirement in addition to 40 general continuing education hours.
- (Sample of a naturopathic medicine school transcript at end of presentation)

Standards of Naturopathic Education

The Counsel of Naturopathic Medical Education (CNME) sets the standards for naturopathic colleges in the areas of finances, faculty education, ethics, program development, education, and clinical competencies.
Standards of Naturopathic Education

| Basic & Diagnostic Sciences | Anatomy, neuroanatomy, neurosciences, physiology, histology, pathology, biochemistry, genetics, microbiology, immunology, lab diagnosis, clinical diagnosis, physical diagnosis, medical research, epidemiology, public health, medical ethics, and others. |
| Clinical Sciences | Family medicine, ENT, cardiology, pulmonary medicine, gastroenterology, rheumatology, neurology, dermatology, urology, infectious disease, pediatrics, geriatrics, obstetrics, gynecology, pharmacology, pharmacognosy, minor surgery, ophthalmology, psychiatry, and others. |
| Naturopathic Therapeutics | Clinical nutrition, botanical medicine, homeopathy, naturopathic manipulative therapy, hydrotherapy, lifestyle counseling, naturopathic philosophy, naturopathic case management, advanced naturopathic therapies, acupuncture and traditional Chinese medicine, & Ayurvedic medicine. |

Source: Handbook of Accreditation for Naturopathic Medicine Programs. Counsel of Naturopathic Medical Education April 2016; 34-52

Typical Educational Breakdown by Year:

- **First year** studies include the normal structure and function of the body with solid introduction to naturopathic theory, philosophy, and therapeutics.

- **Second year** focuses on the study of disease and diagnosis while beginning course work in conventional medicine, including pharmacology, botanical medicine, therapeutic manipulation, clinical nutrition, and homeopathic medicine sequences. To enter into the clinical training of the third year, students must pass all basic science courses and diagnostic courses, as well as a clinic entrance examination.
Typical Educational Breakdown by Year:

• **Third year** continues focusing on the botanical medicine, manipulation, clinical nutrition, and homeopathic medicine sequences, begins the organ systems courses (which emphasize case management), and gives major emphasis to clinical training. Students must pass a clinical primary status exam to proceed in the clinic.

• **Fourth year** continues the organ systems courses. The major focus of the fourth year is practical clinical training, working side by side with licensed physicians caring for patients. A clinic proficiency exam ensures clinical competency prior to graduation.

### Comparison of the Basic Science Education

<table>
<thead>
<tr>
<th></th>
<th>Naturopathic (ND)</th>
<th>Allopathic (MD)</th>
<th>Osteopathic (DO)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anatomy (gross &amp; dissection)</td>
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<td>362</td>
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<tr>
<td>Physiology</td>
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<tr>
<td>Pathology</td>
<td>125</td>
<td>166</td>
<td>152</td>
</tr>
<tr>
<td>Microbiology / Immunology</td>
<td>175</td>
<td>185</td>
<td>125</td>
</tr>
<tr>
<td><strong>TOTAL HOURS</strong></td>
<td><strong>1,125</strong></td>
<td><strong>1,079</strong></td>
<td><strong>976</strong></td>
</tr>
</tbody>
</table>

Above is a comparison of the basic science education of naturopathic doctors to that of an allopathic or osteopathic physician and surgeon, according to the *Journal of Family Practice.*
Naturopathic Physicians Licensing Examination (NPLEX)

California and all other licensing states require naturopathic physicians to pass Parts I and II of the NPLEX. The NPLEX is a rigorous, nationally standardized licensing exam implemented in 1986, replacing individual state exams.

- **NPLEX Part I**: Biomedical Science Examination is an integrated, case-based examination that covers the topics of anatomy, physiology, biochemistry & genetics, microbiology & immunology, and pathology. This examination is designed to test whether the examinee has the scientific knowledge necessary for successful completion of clinical training.

- **NPLEX Part II**: Core Clinical Science Examination is an integrated case-based examination that covers the following topics: diagnosis (using physical & clinical methods, lab tests & imaging studies), materia medica (botanical medicine and homeopathy), nutrition, physical medicine, health psychology, emergency medicine, medical procedures, public health, pharmacology, and research. This examination is designed to test the skills and knowledge that an entry-level naturopathic physician must have in order to practice safely.

Naturopathic Physicians Licensing Examination (NPLEX) Clinical Elective Examinations

- **NPLEX Minor Surgery Exam**: This examination is case-based and is highly recommended by most states that allow NDs to perform minor office surgery/procedures.

- **NPLEX Pharmacology Exam**: This examination is not case-based, but comprised of stand alone questions and is highly recommended by most states that allow NDs to have independent prescriptive rights.

- Although the majority of examination candidates take both of the elective examinations, California is in the process of requiring that the elective minor surgery and pharmacology examinations are mandatory for licensure.
Safety Records

Naturopathic Doctors have the Best Safety Records

- The Naturopathic Medicine Committee rarely receives complaints about licensed naturopathic doctors
- The majority of complaints are for unlicensed practice violations.
Types of Enforcement Cases

Licensees VS. Unlicensed Cases

- 70% Licensees
- 27% Unlicensed
- 3% Applicants

62 Total Cases
- 42 Unlic. Activity
- 18 ND cases
- 2 Applicants

Types of Cases Against Licensees

- 44% Advertising
- 11% Address Failure
- 22% DUI Violation
- 17% Unprofessional Conduct
- 6% Death/Patient Harm

18 Cases Against NDs
- 8 Advertising
- 1 Address
- 3 DUI
- 4 Unprofessional
- 2 Death/Harm

Unlicensed Practice
(naturopaths)
Unlicensed Naturopathic Practice is a Big Problem in California

- Naturopaths are not the same as Naturopathic Doctors.
- Naturopaths are not licensable.
- Naturopaths cannot provide any services other than education.
- However, naturopaths make up 70% of the Committee’s enforcement population.

Naturopaths need to follow the law

- The law is confusing to consumers.
- Many naturopaths are practicing medicine and naturopathic medicine without the benefit of a license.
- Naturopaths are not providing appropriate disclaimers of unlicensed status per CA B&P Code sections 2053.6 and 3644(d)(2).
- There is a dire need for title protection to alleviate the confusion in the marketplace and further protect consumers from unlicensed individuals.
Malpractice Insurance

• Most malpractice companies issue the same policy to NDs vs. other healing arts professionals for half the cost due to low risk factors of naturopathic medicine.
• Malpractice claims are lowest for ND profession across the nation.
• NDs make up less than 0.001% of all malpractice claims
Drug Formularies for Naturopathic Doctors

• Most ND Regulatory Boards allow Independent Prescribing of:
  – Schedule III through V Controlled Substances
  – Legend Drugs
  – Hormones (natural and synthetic)
  – Natural Substances

• Formularies
  – Exclusionary
  – Easier to Maintain Formularies
Naturopathic Medicine Scope

• In most states, scope includes minor office procedures and independent prescribing rights.

• California is limited in its scope, but the Committee plans to implement the Legislature’s original intent to include the minor office procedures and independent prescribing rights by sponsoring a scope modernization bill to ensure parity with neighboring states.