

March 7, 2021

Senator Kevin Cook
Chair Senate Commerce and Human Resources Committee
Idaho Senate
P.O. Box 83720
Boise, ID 83720-0081

Dear Senator Cook and Members of the Committee,

The Association of Accredited Naturopathic Medical Colleges (AANMC) has been monitoring the challenges faced by the Naturopathic Board of Health Care in implementing Chapter 59. We were surprised by the precipitous introduction of SB1375 in the Senate Commerce and Human Resources Committee, as the proposed language could potentially jeopardize the safety of the citizens of Idaho. The state of Idaho risks liability due to the negative consequences of loosening educational standards through the Board's discretionary inclusion of programs. This liability becomes evident when considering prior warnings in public testimonies regarding the state's exposure to legal risks. If the state proceeds with substandard education requirements despite these warnings, both the state and the Board assume responsibility for any adverse patient outcomes resulting from their decision.

SB1375 significantly weakens the educational standards for naturopathic medicine outlined in Chapter 59, further deviating from the original statute. The inclusion of the phrase "valid doctoral degree in naturopathy" without specifying the criteria for a "valid" degree removes the previous requirement for a degree from an institution accredited by the US Department of Education, thereby lowering the academic standard for licensure. In this model, there are no validated assessment standards, clinical supervision and assurance that licensees meet established clinical competencies before attaining a license to practice naturopathic medicine.

Moreover, the provision stating that an individual must have "completed a postgraduate program in naturopathy" allows for the completion of any continuing education program from an accredited entity to fulfill the requirements of SB1375. This shift in academic standards from a degree from an accredited institution to merely continuing education from an accredited institution not only undermines the rigorous nature of naturopathic medical education but also compromises the standards of regulation for healthcare professionals.

Accredited postgraduate naturopathic education (also known as naturopathic residencies) are only available to graduates of naturopathic institutions accredited by the Council on Naturopathic Medicine Education and are a continuation of undergraduate medical education competencies.

The addition of the clause "or has equivalent training that demonstrates minimum competency in the practice of naturopathic health care as approved by the board" grants the Naturopathic Board of Health Care unrestricted authority to approve any program, regardless of its quality.

This opens the door to approval of programs from diploma mills and online-only correspondence schools, which do not meet federally accepted education standards.

Furthermore, the broad language of Chapter 59 allows individuals from all over the country to apply for both the "licensed naturopathic doctor" and "registered naturopath" designations in Idaho. This puts Idaho in direct conflict with other US jurisdictions that have higher educational standards for licensing naturopathic doctors and exposes regulatory boards in both Idaho and other states to significant legal risks.

In light of these concerns, we urge you not to proceed with SB1375. Upholding stringent educational standards is essential to ensuring the safety and well-being of patients, and SB1375 undermines these standards. This bill, along with the foundational statute it is based on, completely disregards established norms for regulating healthcare professionals. It equates to granting licensed naturopathic medical doctors the ability to obtain licensure as acupuncturists, chiropractors, podiatrists, or even medical doctors by completing mere hours of unregulated continuing education. Such leniency would never be tolerated for other licensed professions, and it should not be permitted to erode the standards of naturopathic medicine in this manner.

Sincerely,

JoAnn Yanez, ND, MPH, CAE
Executive Director
Association of Accredited Naturopathic Medical Colleges (AANMC)