Memorandum in Opposition to S. 1930/A. 1370
Licensure of Naturopaths

The American College of Surgeons (ACS) strongly opposes legislation (S. 1930/A. 1370) that would amend the Education law to allow for the professional licensing of naturopaths in New York State and authorize them to prescribe, administer, diagnose, and treat patients in lieu of care provided by a medical doctor.

The ACS is the largest surgical organization in the world, with over 74,000 members nationwide and approximately 5,000 in New York. The ACS has a strong history of addressing matters relating to patient care and safety and the ACS is concerned that the proposed legislation would allow a naturopath to practice medicine without the oversight and education requirements imposed on medical doctors. Practicing outside of their scope of practice and without proper supervision by a medical doctor may open up patients of New York to unsafe environments and procedures. The prerequisites for becoming a naturopath do not adequately prepare a person to perform the services that the scope of practice would allow, including many of the same surgical procedures that would otherwise require years of supervised clinical training to perform.

The ramifications of this legislation run contrary to the stated intent to protect the public from unregulated medical practices. This bill authorizes the use of the title “naturopathic doctor” or “doctor of naturopathic medicine” which will lead many New Yorkers to assume that a naturopath is the equivalent of a licensed physician. Moreover, this legislation fails to provide the necessary consumer protections mandated in conventional medicine in order to preserve public health and safety.

If the New York Legislature wishes to protect the public by licensing naturopaths, it is essential that the scope of naturopathy be clearly defined, limited and consistent with the education and training that naturopaths receive. Additionally, the same accountability standards as medical doctors must be in place in the event that naturopaths are allowed licensure as naturopathic doctors, including oversight by the Board of Medicine and Office of Professional Misconduct.

The ACS urges the legislature to oppose the proposed legislation. By doing so patients and citizens of New York would be protected from being treated by individuals who do not have sufficient training and experience to safely perform the tasks a medical doctor is trained to perform.