
Wisconsin Legislative Council

ACT MEMO



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2021 Wisconsin Act 130
[2021 Assembly Bill 529]

Naturopathic Doctors

LICENSURE OVERVIEW

2021 Wisconsin Act 130 creates regulatory oversight and licensing requirements for the practice of naturopathic medicine, administered by a Naturopathic Medicine Examining Board.

The act creates two categories of licensed naturopathic practice:

- **A licensed naturopathic doctor (ND)** must have a doctoral degree from a U.S. or Canadian program accredited by the Council on Naturopathic Medical Education, and meet other professional requirements. The person may use the title ND or naturopathic doctor. A licensed ND may diagnose and treat, order clinical laboratory tests and diagnostic imaging studies, perform minor office procedures, dispense nonprescription drug products, and sign certificates.
- **A licensed limited-scope ND** must have completed a degree in doctor of naturopathy before 2013, have continually practiced in Wisconsin for at least 10 years immediately prior to submitting an application, and meet certain training and other professional requirements. The person may use the title ND or naturopathic doctor. A licensed limited-scope ND may diagnose and treat, and order limited laboratory tests.

The act also explicitly recognizes a third category of naturopathic practice, which is not licensed. A person who is a traditional or lay naturopath may use the title “naturopath,” and is not subject to any educational requirements for that practice. In addition, the act allows a person to provide information in connection with the sale of vitamins or herbs, or provide advice regarding the use of a therapy, including herbal medicine, homeopathy, nutrition, or other nondrug or nonsurgical therapy, without an ND license.

A person may practice within the scope of other credentialing held by the person, such as a registered nurse, acupuncturist, or massage therapist, without an ND license.

PRACTICE

The act defines “naturopathic medicine” as a system of primary health care for: (1) the prevention, diagnosis, and treatment of human health conditions, injury, and disease; (2) the promotion or restoration of health; and (3) the support and stimulation of inherent self-healing processes through patient education and the use of naturopathic therapies and therapeutic substances.

A licensed limited-scope ND must limit the practice of naturopathic medicine to the scope of the person’s experience, education, and training, and may do any of the following if within that scope:

- Perform a physical examination for diagnostic purposes.
- Utilize diagnostic or evaluation methods.

- Order or perform clinical laboratory tests.
- Dispense, administer, or order any of the following:
 - Health education and health counseling.
 - Food, extracts of food, nutraceuticals, vitamins, amino acids, minerals, enzymes, botanical medicines, homeopathic medicines, and dietary supplements.
 - Hot or cold hydrotherapy, naturopathic physical medicine,¹ the use of therapeutic medical equipment, and therapeutic exercise.

A licensed limited-scope ND may apply to the board to practice beyond this list, and the board may authorize an expanded scope, if the person demonstrates to the board that the person is qualified to expand the scope of practice.

A licensed ND may do all of the above and any of the following in the practice of naturopathic medicine:

- Order or perform phlebotomy, diagnostic sonography, or electrocardiography.
- Order diagnostic imaging studies.
- Dispense, administer, or order devices, including therapeutic devices, barrier contraception, and durable medical equipment.
- Recommend, dispense, and administer nonprescription drug products.
- Perform minor office procedures, including repair and care incidental to superficial lacerations, abrasions, and lesions, and the removal of foreign bodies located in the superficial tissues.
- Sign or attest to any certificate, card, form, or other documentation, if within the person's scope of practice, including a student's excused absence note for school attendance and pronouncement of time of death for a death certificate.
- Any practice identified by the board, by administrative rule, within the scope of these practices.

The act specifies that the practice of naturopathic medicine is distinct from the practice of medicine and surgery. The act further specifies that an ND may not do any of the following: perform any surgical procedures (other than a minor office procedure); perform surgical procedures involving the eye, ear, tendons, nerves, veins, or arteries that extend beyond superficial tissue; use general or spinal anesthetics; administer ionizing radioactive substances; perform chiropractic or spinal adjustments or other prohibited naturopathic physical medicine; or perform any other practice prohibited by the board by administrative rule.

APPLICATION

A licensed ND must meet all of the following educational and competency requirements:

- Have a graduate-level degree of doctor of naturopathy or doctor of naturopathic medicine from a U.S. or Canadian program accredited by the Council on Naturopathic Medical Education or an

¹ Naturopathic physical medicine may include mechanical treatment of body structures or tissues, such as massage, stretching, resistance, or joint play examination. Naturopathic physical medicine does not include chiropractic or spinal adjustments, the principles or techniques of chiropractic science, or the manipulation or adjustment of the spine or extremity joints beyond the elastic barrier, including small amplitude movement at or beyond the end range of normal joint motion.

equivalent organization, and meet certain other conditions for an institution of higher education or institution that predates the Council on Naturopathic Medical Education.

- Pass a competency-based national naturopathic licensing examination administered by the North American Board of Naturopathic Examiners or successor organization, or other examination approved by the board by administrative rule.
- Pass a pharmacology examination approved by the board by administrative rule.
- Pass any other competency or jurisprudence examination required by the board by administrative rule.
- Meet any character and fitness, physical and mental competency, and professional competency requirements, and additional clinical, practical, or residency requirements, established by the board by administrative rule.

A licensed limited-scope ND must submit an application within one year after the board begins accepting applications, and must meet all of the following educational and competency requirements:

- Have a degree of doctor of naturopathy, completed before 2013, from a naturopathic health care program offered in the United States.
- Provide evidence of training through one of the following methods:
 - At least 250 hours of education in the degree program in two or more clinical sciences addressing body systems and their interactions, cardiology, psychology, dermatology, endocrinology, EENT, gastroenterology, immunology, urology, proctology, gynecology, neurology, orthopedics, pulmonology, natural childbirth and obstetrics, pediatrics, geriatrics, rheumatology, oncology, and hematology.
 - Licensure as a registered nurse under state law as of the date of application.
 - At least 250 hours of qualifying training in clinical sciences after completion of a doctor of naturopathy program, or a combination of at least 250 hours of education and subsequent training in clinical sciences.
 - An agreement to complete at least 250 hours of qualifying training, or a combination of at least 250 hours of education and subsequent training in clinical sciences, within five years after issuance of an initial license. The agreed training also counts towards a person's continuing education requirements.
- Pass competency and jurisprudence examinations required by the board by administrative rule.
- Have a history of continuous practice of naturopathic medicine in Wisconsin for at least 10 years immediately prior to submitting the application.
- Have a record of safety in the practice of naturopathic medicine or naturopathy.
- Meet any character and fitness, physical and mental competency, and professional competency requirements established by the board by administrative rule.

RENEWAL

A licensed ND or licensed limited-scope ND must renew the license every two years. The board must establish continuing education requirements by administrative rule.

EXAMINING BOARD

The Naturopathic Medicine Examining Board may interpret and identify the practices described under the act that are included and excluded from the practice of naturopathic medicine. However, the board may not otherwise expand the scope of practice of a licensed ND or licensed limited-scope ND beyond the practice of naturopathic medicine described under the act.

The board must establish, by administrative rules, a code of ethics governing the professional conduct of licensed NDs and licensed limited-scope NDs, standards of practice, continuing education requirements, and examination standards. The board may further establish character and fitness requirements, physical and mental competency requirements, professional competency requirements, and additional clinical, practical, or residency requirements. The board may also establish minimum malpractice insurance requirements for licensed NDs and licensed limited-scope NDs.

The board membership includes four licensed NDs, one primary care physician who has experience in naturopathic medicine or working with NDs, and two public members.

Effective date: The licensure requirements take effect March 1, 2024. Other provisions of the act took effect February 6, 2022.

MSK:jal