



**Briefing Document:  
Expanding Patient Access to Naturopathic Doctors (NDs)  
Offers the Best in Integrative Medicine**

**Naturopathic Medicine - A “Disruptive Innovation” to Reduce Chronic Disease**

Naturopathic Medicine has been referred to as a “disruptive innovation,” as published in the journal *Medicina*,<sup>1</sup> with the potential to transform health care as an effective model of primary care that is less dependent on costly drugs and technological intervention and which also explicitly promotes improvements in health. It can reduce the need for expensive medical care by promoting wellness and decreasing the need for many medical interventions.

As a distinct system of primary care medicine, Naturopathic Medicine combines natural therapeutic traditions with conventional medicine to restore and optimize health. It is a comprehensive approach to whole-person primary care with a focus on minimally invasive and low-cost therapies to prevent, diagnose, and treat health conditions. Licensed Naturopathic Doctors (NDs), also called naturopathic physicians, prioritize early intervention and non-invasive treatments designed to address the root cause of disease, rather than focusing primarily on symptom management or suppression. **Identify and Treat the Cause** is one of the six foundational principles of Naturopathic Medicine<sup>2</sup>, and is perfectly aligned with Section 2(b) of President Trump’s February 13, 2025 Executive Order creating the Make America Healthy Again Commission to prioritize research on the root causes of why Americans are getting sick.

With a focus on health promotion and disease prevention, NDs first emphasize nutrition, exercise, sleep, toxin exposure, preventive behaviors, and stress-management counseling before moving on to clinical nutrition, herbal medicine, homeopathy, and hands-on manual therapies -- with costly prescription drug therapies only used if absolutely needed rather than as the first line of defense.

To be eligible for licensure, NDs must graduate from a four-year, in-residence, doctoral-level program accredited by the Council on Naturopathic Medical Education (CNME). CNME is an accrediting agency recognized by the U.S. Department of Education. Graduates must then pass a standardized board examination to be eligible for licensure, similar to conventional medicine’s USMLE.

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<sup>1</sup> Bradley R, Harnett J, Cooley K, McIntyre E, Goldenberg J, Adams J. Naturopathy as a Model of Prevention-Oriented, Patient-Centered Primary Care: A Disruptive Innovation in Health Care. *Medicina*. 2019; 55(9):603. <https://doi.org/10.3390/medicina55090603>

<sup>2</sup> American Association of Naturopathic Physicians. “Principles of Naturopathic Medicine.” Accessed February 13, 2025. <https://naturopathic.org/page/PrinciplesNaturopathicMedicine>.

Naturopathic physicians are licensed in 26 US jurisdictions. Their **services are currently recognized by a variety of private insurance, Medicaid, and Medicare Advantage programs, but have yet to be recognized in federal programs like Medicare or military health care.**

### **Expanded Treatment Options & Addressing the Shortage of Primary Care Physicians**

Improving quality of care, increasing access to care, and controlling healthcare costs depend on the adequate availability of healthcare providers. Data shows that the United States could see an estimated primary care physician shortage of between 21,400 and 55,200 by 2033.<sup>3</sup>

Additionally, the current utilization patterns show that the demand for primary care physicians is projected to grow more rapidly than physician supply.<sup>4</sup> **Integrating and utilizing licensed naturopathic physicians, who are trained in primary care and specialize in disease prevention, chronic care management, and whole person wellness, into our health care system could help address the demand for primary care services and supplement the depleting primary physician supply.**

It also supports President Trump's **MAHA Commission Executive Order Section 2(d)** calling on agencies to ensure the availability of expanded treatment options and the flexibility for health insurance coverage to provide benefits that support beneficial lifestyle changes and disease prevention.

In many states, both Medicaid and private insurance provide patient access to the services of licensed naturopathic physicians. **However, any clinic that treats a large Medicare population, which includes most FQHCs and rural clinics who rely on Medicare funding, are unable to hire licensed NDs to fill their primary care workforce shortage.** This is simply because licensed naturopathic physicians are not Medicare-eligible providers, creating a massive barrier preventing these clinics from hiring otherwise qualified providers.

This lack of Medicare coverage also interrupts patient continuity of care, as elderly patients transition from private insurance or Medicaid to Medicare, often losing access to their preferred and trusted primary care provider.

While the naturopathic profession is significantly smaller than that of conventional medicine, it nonetheless is **common sense that our healthcare systems should fully utilize every healthcare provider that has been trained and licensed as primary care providers to the full extent of their training and licensure.** Removing policy barriers allows naturopathic physicians to be integrated into the healthcare system, to be hired for the thousands of unfilled healthcare jobs particularly in rural and underserved communities, and to be covered by public and private insurance.

### **Removing Barriers to Licensed Naturopathic Physicians is Fiscally Responsible**

A body of knowledge too vast to enumerate highlights the cost-effectiveness of lifestyle-oriented self-care, nutrition, preventive behaviors, and other approaches central to naturopathic medicine in

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<sup>3</sup> Association of American Medical Colleges (AAMC)

<sup>4</sup> Health Resources and Services Administration (HRSA)

managing, improving, or even reversing chronic diseases. By addressing modifiable risk factors — such as physical inactivity, obesity, poor dietary choices, alcohol use, and environmental exposures — naturopathic care takes a preventive approach that targets the root causes of chronic diseases and their associated health and financial burdens.

A recently released Health Technology Assessment (HTA) provides an evidence-based summary of naturopathic practice and the safety, economics and effectiveness of naturopathic care. The scope of the HTA was informed by research conducted by the international naturopathic community over the last thirty years encompassing over 2,000 peer-reviewed scientific articles, of which more than 300 clinical studies involving over 100 different health populations are included. Key findings have included:

- Naturopathic researchers have conducted original clinical research involving over 100 different health populations.<sup>5</sup>
- **Naturopathic medicine decreases prescription drug costs.** Many studies have found that naturopathic care results in substantially lower prescription drug costs than conventional care. Naturopathic physicians typically prescribe botanical or nutritional supplements to effectively care for medical problems rather than expensive prescription drugs. Patients who received intensive lifestyle modification and naturopathic therapy in just one year for type II diabetes improved all health scores (lipid levels, body fat percentage, etc.) and decreased medication requirements compared to those on standard therapy.<sup>6</sup>
- 81.1% of the studies on the effectiveness of naturopathic clinical practice identified a positive response to at least one primary or secondary outcome measure.<sup>7</sup>
- Naturopathic physician care has been shown to reduce employee sick days and cost, while improving productivity.<sup>8,9</sup>
- Numerous studies have demonstrated that using non-invasive, non-toxic approaches lowers health care costs.<sup>10,11</sup> Patients with the greatest disease burden show the most significant reduction in total medical expenditures when utilizing integrative medicine.<sup>12</sup>

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<sup>5</sup> <https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>, accessed 10/20/24.

<sup>6</sup> Hernan WH, Brandle M, Zhang P et al. Costs associated with the primary prevention of type 2 diabetes mellitus in the diabetes prevention program. *Diabetes Care*. 2003; 26(1):36-47.

<sup>7</sup> Lloyd, I., Steele, A., and Wardle, J., [Naturopathy, practice, effectiveness economics & safety](#). World Naturopathic Federation. Section 3, Chapter 8. 2022.

<sup>8</sup> Herman, P.M., Szczerko, O., Cooley, K., and Mills, E.J., *Cost-effectiveness of naturopathic care for chronic low back pain*. *Alternative Therapies in Health & Medicine*, 2008.

<sup>9</sup> Noe, B. *Vermont Car Dealers Help to Quantify the Benefits of Naturopathic Care*, in 21st Annual Conference of the American Association of Naturopathic Physicians. 2006. Portland.

<sup>10</sup> Herman PM, Szczerko O, Cooley K, Seely D. A naturopathic approach to the prevention of cardiovascular disease: cost-effectiveness analysis of a pragmatic multi-worksites randomized clinical trial. *J Occup Environ Med*. 2014 Feb;56(2):171-6. doi: 10.1097/JOM.000000000000066. PMID: 24451612; PMCID: PMC3921268.

<sup>11</sup> Tais S, Oberg E. [The economic evaluation of complementary and alternative medicine](#). *Natural Med J*. 2013;5(2).

<sup>12</sup> Sarnat RL, Winterstein J, Cambron JA. Clinical utilization and cost outcomes from an integrative medicine independent physician association: an additional 3- year update. *J Manipulative Physiol Therapeutics* 2007; 30(4): 263-269.

- A systematic review of randomized clinical trials found that use of natural health products such as those recommended by naturopathic doctors has the potential to reduce costs compared to conventional treatment by up to 73%.<sup>13</sup>
- Additional examples of cost-effectiveness studies can be found at [Naturopathic Doctors: Whole Health and Preventive Care Specialists](#)

This information and more has also been [shared with the House Budget Committee](#) for their Request for Information dated October 14, 2023. Policymakers should ensure that licensed healthcare professionals such as naturopathic physicians who prioritize cost-effective, outcome-driven care, are empowered to practice to the full extent of their scope and are recognized and covered as eligible providers in all federal programs.

## Key Policy Solutions

### *Tier 1 - Policy changes not requiring congressional approval*

1. **Direct CMS to require that states receiving federal Medicaid funding credential and cover Naturopathic Doctors (NDs) as primary care providers.**

Currently, only six states cover naturopathic doctors in Medicaid: VT, WA, CT, OR, AZ, and NM. This policy would address workforce shortages, expand patient choices, treatment options and access to whole-health, prevention-based medicine, and improve health outcomes while lowering costs.

2. Direct the Veterans Health Administration and Department of Defense **to create a Qualification Standard and Employment Code** allowing them to hire naturopathic physicians to strengthen their “whole health” initiative, and allowing retired and active duty military to benefit from the expertise of naturopathic physicians in non-pharmacological pain management and chronic disease care.

Currently, the VA and DoD don't recognize licensed NDs as eligible providers, hindering their ability to hire qualified NDs.

3. **Appoint licensed naturopathic physicians** to the new Make American Healthy Again Commission, and any committee, task force, or advisory role to bring the voice of experts who have focused on natural, preventive medicine for over a century to the table.
4. Ensure the FDA **protects patient access to compounded medications**. Compounded medications are customized medications prescribed by physicians based on the specific needs of a patient. For patients who have allergies to common fillers, are unable to swallow pills and need a liquid or topical form, or need a custom dosage, compounding medications can be lifesaving. Compounded medications fill a gap in health care by creating customized solutions for specific patient needs that cannot be treated with mass-produced, pharmaceutical medications.

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<sup>13</sup> Kennedy DA, Hart J, Seely D. Cost effectiveness of natural health products: a systematic review of randomized clinical trials. eCAM 2009; 6(3) 297-304.

Despite a long history of safe use and patient need, the FDA has been reviewing and **blocking patient access to more than 300 ingredients used in these compounded medications**. The FDA's current position is that if there is an approved pharmaceutical equivalent that will address the condition, the compounded ingredient is not needed. Yet many of these ingredients have U.S. Pharmacopeia *Dietary Supplement* monographs, which Congress intended to also be available for compounding, but which FDA has refused to accept in its overreach. This has the effect of *restricting patient access to over 300 compounded drugs using natural substances*.

Compounded bioidentical hormones (cBHTs), for example, can help men and women to alleviate symptoms associated with age-related hormone changes, such as hot flashes in menopause, or low muscle mass due to decreased testosterone.

**The AANP recommends directing the FDA to accept substances with U.S. Pharmacopeia Dietary Supplement monographs** in addition to drug monographs for use in compounding patient-specific medications currently used by millions of patients.

**Additionally, the FDA should be directed to not restrict access to cBHTs.** The FDA is currently reviewing recommendations from a highly biased and controversial report published by the National Academies of Sciences, Engineering, and Medicine (NASEM) which did not consider evidence for patient reliance on cBHTs. NASEM's recommendations would limit prescribing guidelines and severely limit the availability of cBHT by placing these hormones on the Agency's Difficult to Compound List despite decades of being compounded safely.

5. **Promote the use of Food as Medicine.** The AANP recommends promoting food as medicine programs and appointing naturopathic doctors to relevant healthcare task forces, committees, and advisory panels charged with improving nutrition or developing "food as medicine" programs. Naturopathic physicians were among the first to pioneer institutions that promote "food as medicine," like the National University of Natural Medicine's Food as Medicine Institute, and naturopathic physicians receive more education in nutrition than any other primary care medical provider.

## ***Tier 2 - Policy changes requiring congressional approval***

1. **Modernize the definition of "physician"** in §1861 (42 U.S.C. 1395(r)(1)) of the Social Security Act (SSA) to include licensed naturopathic physicians. This would allow licensed naturopathic physicians to participate in Medicare and provide care to seniors. This would also address the cascading barriers that prevent Medicare-eligible Americans from accessing licensed naturopathic physicians, including unnecessary burdens on providers and patients, an inability to fill vacant jobs, ineligibility for loan repayment programs, and limited residencies.
2. **Protect and support funding to the National Center for Complementary and Integrative Health (NCCIH)** to aggressively conduct research on integrative, interprofessional, patient-centered, and whole person care that has the potential to transform our disease-care system to a true health-care system.

Currently, NCCIH is the 2nd *least* funded agency within the National Institutes of Health. Yet it is NCCIH that is at the forefront of conducting research in and providing evidence for the “**disruptive innovations**” in integrative and whole person health that lead to improved patient outcomes and reduced costs. NCCIH should be appropriately funded for the government to truly embrace disruptive innovations to end our chronic disease epidemics, heavy reliance on pharmaceuticals over common sense cost-effective lifestyle medicine, and the commensurate runaway spending of our “sick care” system. This also perfectly reflects Section 2(b) of President Trump’s February 13, 2025 Executive Order creating the Make America Healthy Again Commission to prioritize gold-standard research on the root causes of why Americans are getting sick.

3. **Safeguard patient access to homeopathic medicines.** In 2019 the FDA withdrew its regulatory pathway for homeopathic products in an attempt to align its oversight of these products with the agency’s evolving general enforcement-based policies. This has created both regulatory and legal chaos that is reducing and, in some cases, eliminating access to medicines Americans rely on.

The AANP supports efforts to modernize the law regarding the regulation of homeopathic medicines in order to provide a clear, consistent, and stable framework for the large number of Americans who rely on homeopathic medicines to restore and maintain their health. This will ensure safety while preserving consumer and practitioner access to the full range of homeopathic medicines from a diversity of suppliers in a resilient and competitive marketplace. Here are [Key Facts](#) about homeopathic medicines.

### **Removing Barriers to Licensed Naturopathic Physicians Honors Freedom of Choice**

Last but not least, expanding patient access to naturopathic doctors offers several benefits, including increasing patient choice and satisfaction. Providing patients with access to a wider range of healthcare options allows them to choose approaches that reflect their values and preferences, leading to greater satisfaction with their care, and offering expanded treatment that support beneficial lifestyle changes and disease prevention.

#### **About the AANP:**

The American Association of Naturopathic Physicians (AANP) is the professional association that represents licensed naturopathic physicians. The AANP strives to make naturopathic medicine available to every American and to increase recognition of naturopathic physicians as the identified authorities on natural medicine. Learn more at [www.naturopathic.org](http://www.naturopathic.org).