

State Emergency Declarations and Inclusion of NDs in Provision of Emergency Services

(Updated May 7, 2020)

State:	Emergency or disaster declaration?	Link:	Declaration or statute allows NDs/NMDs to practice during emergency?	Notes/additional information:
Alabama	Yes	Link	No	No information in declaration.
*Alaska	Yes	Link	No	It appears that Alaska allows for the issuing of courtesy licenses under specific circumstances, including a declared emergency. However, according to Sara Chambers, Division Director of the Alaska Division of Corporations, Business and Professional Licensing, "We don't have a courtesy license for naturopaths, but that's a good idea."
*Arizona	Yes	Link	Likely	Press release says the emergency order allows ADHS to waive licensing requirements to provide healthcare officials with assistance in delivering services during times of heightened demand, though such language is not found in the actual emergency declaration. Contact the Naturopathic Physicians Medical Board for more information. See also Executive Order 2020-15 re. expanded access to telemedicine (note: it does not allow telemedicine consults for medical cannabis).

Arkansas	Yes	Link	Unlikely	No information in declaration.
*California	Yes	Link	Yes	Any out-of-state personnel, including medical personnel, entering California to assist in preparation for, responding to, mitigating the effects of, and recovering from COVID-19 shall be permitted to provide services in the same manner as prescribed in Government Code Section 179.5. See this page for details and application form. See also EMSA guidance re. out of state medical personnel and EO N-43-20.
*Colorado	Yes	Link	TBD	"A provider with an expired or lapsed license, registration, or certification may operate within a 60-day grace period without being subject to penalties or fines under C.R.S. \$12-20-202(1)(e). Note: Medical professionals must be aware of reimbursement and liability concerns beyond the date of license expiration." See DORA guidance re. emergency licensing.
*Connecticut	Yes	Link	No	No information in declaration. Per the CNPA, there are currently no emergency processes/procedures in place to expedite licensure of or grant temporary licenses to NDs.
Delaware	Yes	Link Link Link	No	No information in declaration. See also <u>DE COVID-19 website</u> .
Florida	Yes	Link	Unlikely	The state of emergency waives licensure requirements for out- of-state healthcare professionals who render services in Florida related to COVID-19, as long as they do so for the American Red Cross or the Florida Department of Health (DOH). However, NDs are facing a hostile environment in Florida at the moment, with some NDs having received cease and desist letters (prior to the COVID-19 crisis).
Georgia	Yes	Link	No	The Georgia Composite Medical Board (GCMB) is authorized to grant temporary licenses to physicians who apply for a

				temporary medical license and are currently licensed as a physician in good standing by equivalent boards in other states to assist with the needs of this public health emergency. The Attorney General's office has stated this does not apply to NDs.
*Hawaii	Yes	Link	Yes	No specific mention of medical personnel in the proclamation. However, see Hawaii Revised Statutes §455-8.4 Public health emergency; temporary and limited license for licensed out-of-state naturopathic physicians. Contact the Board of Naturopathic Medicine for more information.
*Idaho	Yes	Link	No	Current emergency provisions do not apply to NMDs. Per the IDAANP: The Idaho licensure statute does not allow for licensure of naturopathic medical doctors until July 1, and it does not contain the same provisions that allow MDs to come into the state to work in case of an emergency.
Illinois	Yes	Link	No	No information in declaration. Per the ILANP 3/31/2020: "We don't have any Executive Orders that apply to us at the moment". However, IL does have a volunteer registry for medical professionals, and it accepts registration of NDs (see Physicians, Naturopathic). They also have a temporary practice application, but it does not include NDs. See new Executive Order (issued 4/1/2020); ILANP is exploring possibilities.
Indiana	Yes	Link	No	No information in declaration. The AANP has received reports that NDs are able to register for temporary licenses to provide healthcare services in the State of Indiana using this link: https://www.in.gov/pla/4096.htm, but later reports are that the temporary license(s) issued using such link were issued in error.
Iowa	Yes	Link	Unlikely	No information in declaration.
*Kansas	Yes	Link	Yes	No mention in emergency proclamation, but Kansas is offering

				emergency licenses to all healthcare providers regulated by the board of healing arts, which includes NDs. See regulatory board's website for announcement about emergency licensure, and memo that further explains it. "The Emergency Temporary License for the COVID-19 response is available for all health care professions regulated by the Board."
Kentucky	Yes	Link	No	Medical and Osteopathic physicians not already licensed to practice in the Commonwealth of Kentucky may register to practice within Kentucky during the state of emergency declared by Governor Beshear. Kentucky Board of Medicine page states "This registration is only for physicians." Does not appear to include NDs/NMDs.
Louisiana	Yes	Link	Unlikely	RS 29:764, the Louisiana Health Emergency Powers Act is referenced, which says, in part "(9) Provide for the temporary appointment, licensing or credentialing of health care providers who are willing to assist in responding to the public health emergency."
*Maine	Yes	Link	TBD	No information in declaration. See <u>article re. out of state</u> licensing and Board of Medicine page re. COVID.
*Maryland	Yes	Article Link	No	The state association is not aware of any expedited or emergency licensing processes for NDs. Under the Governor's emergency order, this is the "list of businesses that may stay open during the state of emergency. The list of healthcare organizations and businesses is very broad, and is not limited to those enumerated. Our lobbyist has not indicated that we would be required to close." License expiration dates are automatically being extended: "Pursuant to Governor Hogan's Executive Order of March 12, 2020, the Board will extend the license expiration date up to the 30th day after the date by which the state of emergency is

				terminated and the catastrophic health emergency is rescinded. If you fail to renew the license by the 30th day after the date by which the state of emergency is terminated, the license will expire and you will be required to submit an application for reinstatement of your license that will include applying for a new criminal history records check (CHRC)." Additionally, it appears that all allied health licensure fees have been reduced for fiscal years 2020-2021. See also Executive Order re. Healthcare Matters.
*Massachusetts	Yes	Link	TBD	With the Governor declaring a State of Emergency, the Board of Registration in Medicine has established an Emergency Temporary License Application for out-of-state physicians to assist in meeting the increased demand for physician services in Massachusetts. To qualify for an Emergency Temporary License a physician must hold an active full, unlimited and unrestricted medical license in good standing in another U.S. state/territory/district. "Good standing" shall not include a license that has been revoked, cancelled, surrendered, suspended, or is subject to disciplinary restrictions. All physicians whose licenses have or will come up for renewal during the State of Emergency, which was declared on March 10, 2020, shall have their renewal date extended until 90 days after the end of the Emergency. No specific mention of NDs.
Michigan	Yes	Link	No	No information in declaration. See LARA Guidance: Exemption of Michigan Licensure Time of Disaster/State of Emergency. Per the MI association, while NDs are not eligible for emergency licenses and cannot volunteer as physicians, they can volunteer, generally: www.michigan.gov/fightcovid19 (public health or other section - not as physicians) or https://form.jotform.com/200947011547047 (as admin).
*Minnesota	Yes	Link	No	No information in declaration. See Executive Order 20-09 (Prohibiting all non-emergency surgeries and procedures) and

				Executive Order 20-16 (Requiring inventory of PPE and vital medical equipment and prohibiting use of consumable medical equipment other than for critical health care services or essential services). Per the MNANP, Executive Orders 20-09 and 20-16 would apply to NDs. The MNANP is not aware of any action taken by either the state or the Board of Medical Practice that would authorize any kind of expanded practice by NDs in response to the emergency. The Governor recently issued EO 20-20 Directing Minnesotans to Stay at Home. The order references federal CISA guidance, as far as exemptions.
Mississippi	Yes	Link	Unlikely	No information in declaration. The Mississippi State Board of Medical Licensure Proclamation states that "until action is taken by the Governor to lift the state of emergency, out-of-state physicians may utilize telemedicine when treating patients in Mississippi without the necessity of securing a license to practice medicine in the state, provided the out-of-state physician holds an unrestricted license to practice medicine in the state in which the physician practices and currently is not the subject of an investigation or disciplinary proceeding and so advises the Board.
Missouri	Yes	Link	Unlikely	No information in declaration.
*Montana	Yes	Link	Yes	No information in declaration, but an Oregon ND was recently able to obtain an emergency naturopathic physician registration in MT. Per its terms, "This registration expires when the state of emergency is no longer in effect and this registration cannot be renewed."
Nebraska	Yes	Link	Unlikely	No information in declaration. See also Executive Order 20-10.
Nevada	Yes	Article Link	TBD	No information in declaration. See also <u>Declaration of Emergency Directive 011</u> .
*New Hampshire	Yes	Link	Yes	Any out-of-state personnel, including medical personnel, entering New Hampshire to assist in preparing for, responding to, mitigating the effects of, and recovering from COVID-19 shall

				be permitted to provide services in the same manner as prescribed in RSA 21-P:41 and any other applicable statutory authority with respect to licensing for a period of time not to exceed the duration of this emergency. See also Emergency Order 15. Per the president of the NHAND, NH DHHS has asked NDs to volunteer during this crisis.
New Jersey	Yes	Link	TBD	No information in declaration. However, A3860 establishing certain requirements to use telemedicine and telehealth to respond to coronavirus disease 2019 recently passed and was signed by the Governor. It provides, in pertinent part: "A health care practitioner who is not licensed or certified to provide health care services pursuant to Title 45 of the Revised Statutes may provide telemedicine and telehealth services pursuant to this section, provided that: (1) the health care practitioner is validly licensed or certified to provide health care services in another state or territory of the United States or in the District of Columbia, and is in good standing in the jurisdiction that issued the license or certification; (2) the health care services provided by the health care practitioner using telemedicine and telehealth are within the practitioner's authorized scope of practice in the jurisdiction that issued the license or certification; (3) unless the health care practitioner has a preexisting provider-patient relationship with the patient that is unrelated to COVID-19, the health care services provided are limited to services related to screening for, diagnosing, or treating COVID-19; and (4) in the event that the health care practitioner determines during a telemedicine or telehealth encounter with a patient located in New Jersey that the encounter will not involve services related to screening for, diagnosing, or treating COVID-19, and the practitioner does not have a preexisting provider-patient relationship with the patient that is unrelated to COVID-19, the practitioner shall advise the patient that the practitioner is not authorized to provide services to the patient, recommend that the patient initiate a new telemedicine or telehealth

				encounter with a health care practitioner licensed or certified to practice in New Jersey, and terminate the telemedicine or telehealth encounter. "
*New Mexico	Yes	Link	No	From the NMANP: Emergency provisions do not apply to NDs at this time. However, applications for naturopathic doctor licensure are now available. See this page for application/more information. 4/20/2020: A member of the NM naturopathic committee reports that "The board had a meeting to deal with the emergency response to Covid-1 and included NDs in their emergency exceptions. Since many of our licensing requirements include action from agencies that are also operating under duress like WA or OR boards of naturopathic medicine, school admissions offices, background check agencies etc., the board will issue licenses even if all of the required materials have not yet arrived." See naturopathic rules and regulations 16.10.22, last paragraph.
New York	Yes	Link	No	While there are some provisions related to licensure of out-of-state physicians, they do not appear to apply to NDs at this time. See also Executive Order 202 and Executive Order 202.5.
North Carolina	Yes	Link	TBD	"I hereby temporarily waive North Carolina licensure requirements for health care and behavioral health care personnel who are licensed in another state, territory, or the District of Columbia to provide health care services within the Emergency Area." Also, the North Carolina Medical Board voted recently to allow recently retired or inactive licensees to return to practice. Declaration language appears to be broad enough to include NDs; NCANP is seeking further information. In EO 121, issued March 27, 2020, "naturopathic healthcare providers" are specifically listed in section 2.C.3. as a COVID-19 Essential Business and Operation. Emergency licensure application form does not include NDs.

*North Dakota	Yes	Link	Possibly	Declaration references North Dakota Century Code \$ 37-17.1, which says, in part " (5) If a person holds a license, certificate, or other permit issued by any state or political subdivision evidencing the meeting of qualifications for professional, mechanical, or other skills, the person may render aid involving that skill in this state to meet an emergency or disaster, and this state shall give due recognition to the license, certificate, or other permit" In the naturopathic laws: "The board may adopt rules allowing for temporary and special licensure to be in effect during the interval between board meetings." See 43-58-07. Licensure granted without examination to individuals licensed in other states, paragraph (3).
Ohio	Yes	Link	TBD	No information in declaration. But per this document, it appears that Ohio is allowing for emergency licensing of physicians.
Oklahoma	Yes	Link	Unlikely	No information in declaration. Governor's order waives part of Oklahoma state law requiring an existing doctor-patient relationship before telemedicine consultations can be conducted. See also Amended Executive Order 2020-07.
*Oregon	Yes	Link	Yes	Oregon Board of Naturopathic Medicine allows naturopathic physicians licensed in another state to provide medical care in Oregon under special provisions. Out-of-state licenses who wish to provide care in Oregon during this time must complete this authorization application. See OAR 850-030-0055 for more information. See also 3-13-2020 email update from OBNM re. COVID-19. Click HERE for the state emergency registry of volunteers (includes NDs).
*Pennsylvania	Yes	Link	TBD	No information in declaration. NDs are supposed to be registered in PA, but the Board of Medicine is still in the rules and regulations process. It appears that the Board of Medicine is

				issuing temporary licenses to out of state physicians.
*Rhode Island	Yes	Link	TBD	No information in declaration. However, a recent tweet noted that "@RIHEALTH Director says licensing has been adjusted - if someone has a medical license in good standing in another state, they can practice in RI after filling out a form. Doctors, RN's, pharmacists, etc. No cost for this new 90 day license." It seems this could or should apply to NDs.
South Carolina	Yes	Link Link Link	No	South Carolina will issue emergency nursing and medical licenses to combat the COVID-19 pandemic. The state medical board can expedite temporary licensure for out-of-state physicians, physician assistants, and respiratory care practitioners within 24 hours. 90-day emergency license application form. Highly unlikely this will apply to NDs since per section 40-31-10 of the South Carolina code, the practice of naturopathy is illegal.
South Dakota	Yes	Link	No	Executive Order references granting emergency licenses to members from Emergency Management Assistance Compact (EMAC) states. No indication it applies to NDs.
Tennessee	Yes	Link	No	The relevant provisions of Tennessee Code Annotated, Titles 63 (includes prohibition on practicing naturopathy) and 68, and related rules are hereby suspended to the extent necessary to give the Commissioner of Health the discretion to allow a health care professional who is licensed in another state, and who would otherwise be subject to licensing requirements under Title 63 or Title 68, to engage in the practice of such individual's profession in Tennessee, if such individual is a health care professional who is assisting in the medical response to COVID-19. However, at least one ND applied using this form, and her application was denied by the Board of Medicine "based on the

				following: The practice of Naturopathy is not permitted in this state. T.C.A. 63-6-205 is the appropriate citation."
Texas	Yes	Link	No	Gov. Abbott directed the Texas Medical Board (TMB) and the Texas Board of Nursing (TBN) to fast-track the temporary licensing of out-of-state physicians, physician assistants, certain retired physicians, nurses, and other license types. To assist license and permit holders affected by and/or assisting with the repose to COVID-19, the TMB will automatically extend some license and permit expiration dates. In addition, Continuing Education requirements related to this renewal extension will be waived. Information on disaster licensing for out-of-state providers can be found here. Per the fine print, the provisions apply to professions already licensed in the state. In April 2020, the Texas Medical Board confirmed to the TXAND that NDs with out-of- state licenses won't be able to get temporary licenses in Texas due to lack of licensure of NDs in Texas.
*Utah	Yes	Link	TBD	No information in declaration.
*Vermont	Yes	Link	Yes	It appears that both MDs and NDs in Vermont can be issued an emergency license: "(10) Issue temporary licenses during a declared state of emergency. The person to be issued a temporary license must be currently licensed, in good standing, and not subject to disciplinary proceedings in any other jurisdiction. The temporary license shall authorize the holder to practice in Vermont until the termination of the declared state of emergency or 90 days, whichever occurs first, as long as the licensee remains in good standing. Fees shall be waived when a license is required to provide services under this subdivision." (See 3 V.S.A. § 129(a)(10).)

Virginia	Yes	Link	No	It appears that professions that are already regulated in the commonwealth will be honored if one has an active license of the same type in another state.
*Washington, DC	Yes	Link	Yes	D.C. Official Code 7-2304.01 is referenced, which says, in part "Appoint licensed health care providers, either from the District of Columbia or from other jurisdictions, as temporary agents of the District of Columbia (A) In effect solely for the duration of the public health emergency; (B) In effect solely for the purpose of assisting the District of Columbia in implementing the provisions of the District of Columbia response plan" This Administrative Order is to set forth requirements under which licensure, registration, or certifications requirements, permits and/or fees shall be waived for healthcare practitioners appointed as temporary agents of the District of Columbia, in order to respond to the COVID-19 public health Emergency." See also 3-13-2020 Mayor's Order re. Waiver of Licensure Requirements for Healthcare Providers. Appears to include NDs, as they are healthcare providers. See also DC COVID-19 page and Medical Reserve Corps request.
*Washington state	Yes	Link	Yes	Washington has an Emergency Volunteer Health Practitioner Act which has been activated in response to the COVID-19 situation in Washington. More information is available here .
West Virginia	Yes	Link	TBD	No information in declaration. But see Executive Order 7-20, paragraph 1.
Wisconsin	Yes	Link	TBD	No information in declaration. See also Emergency Order 16.
Wyoming	Yes	Link	TBD	No information in declaration.

^{*}State licenses or registers naturopathic doctors (NDs)/naturopathic medical doctors (NMDs).

Sources/for additional information:

Alabama:

State COVID Page

Alaska:

March 20, 2020 email correspondence with Sarah Chambers, Division Director of the Alaska Division of Corporations, Business and Professional Licensing.

State COVID Page

http://dhss.alaska.gov/dph/Emergency/Documents/ems/assets/Downloads/MICP.pdf

https://www.commerce.alaska.gov/web/Portals/5/pub/Centralized_Licensing_Regs.pdf

https://www.commerce.alaska.gov/web/cbpl/ProfessionalLicensing/Naturopathy.aspx

Arizona:

State COVID Page

https://www.azdhs.gov/preparedness/epidemiology-disease-control/infectious-disease-epidemiology/index.php#novel-coronavirus-php#no

home

https://azgovernor.gov/sites/default/files/eo_2020-07.pdf

California:

State COVID Page

March 20, 2020 email from Rebecca Mitchell, Executive Officer, California Naturopathic Medicine Committee.

https://emsa.ca.gov/covid19/

https://emsa.ca.gov/wp-content/uploads/sites/71/2020/03/MHPAuthorizationPolicyAndProcedure.pdf

https://realizeahealthycalifornia.org/coronavirus-2020-updates-resources-for-california/

Colorado:

State COVID Page

Guidance for Healthcare Professionals Not Currently Licensed in Colorado

https://www.cpr.org/2020/03/15/like-emergency-medicine-special-forces-colorado-doctors-and-nurses-get-ready-to-combat-coronavirus/

Connecticut:

State COVID Page

Information obtained from Dr. Sarah Ouano, CNPA Legislative Chair, March 2020.

https://www.cnpaonline.org/covid-19

Delaware:

State COVID Page

Governor's Press Release

Florida:

State COVID Page

Surgeon General's Emergency Order

Georgia:

State COVID Page

Information obtained from Dr. Anya Warren, President of the Georgia Association of Naturopathic Physicians March 2020.

Hawaii:

State COVID Page

Idaho:

State COVID Page

Information obtained from IDAANP via email, March 2020.

Illinois:

State COVID Page

Indiana:

Iowa: State COVID Page	
Kansas: State COVID Page	
Kentucky: State COVID Page	
Louisiana: State COVID Page https://gov.louisiana.gov/index.cfm/newsroom/detail/2400 https://law.justia.com/codes/louisiana/2016/code-revisedstatutes/title-29/rs-29-764/	
Maine: State COVID Page https://www.maine.gov/governor/mills/news/governor-announces-significant-recommendations-signs-civil-emergerespond	ency-proclamation
Maryland: State COVID Page Information obtained from Dr. Kristaps Paddock, MNDA President-Elect, March 2020. https://thedailyrecord.com/2020/03/16/md-hospitals-using-telehealth-to-address-coronavirus-worries/	
Massachusetts: State COVID Page	
Michigan:	

Minnesota:

State COVID Page Mississippi: State COVID Page Missouri: State COVID Page Nebraska: **State COVID Page** Nevada: State COVID Page New Hampshire: State COVID Page New Jersey: State COVID Page https://www.njleg.state.nj.us/2020/Bills/A4000/3860_I1.HTM New Mexico: **State COVID Page** New York: **State COVID Page** Information obtained from Dr. Amy Cole, NYANP, March 2020. http://www.op.nysed.gov/COVID-19.html Registry for qualified health professionals offering to assist during COVID-19 crisis (NYANP encourages NDs to register and advises "Naturopathic physicians and naturopathic doctors are not listed in the dropdown menu as options, but you can enter "other" and add an

explanation.")

North Carolina:

State COVID Page

https://www.ncmedboard.org/resources-information/professional-resources/publications/forum-newsletter/notice/ncmb-approves-path-for-retirees-to-help-with-covid-19

North Dakota:

State COVID Page

Ohio:

State COVID Page

Oklahoma:

State COVID Page

Oregon:

State COVID Page

Information obtained from Beth Martin, ED of the OANP, and Dr. Shannon Braden, FNMRA, March 2020. 850-030-0055 Practice in Oregon by Out-of-State Naturopathic Physicians In the Event of an Emergency. https://www.oregon.gov/omb/Topics-of-Interest/Pages/COVID-19.aspx

Pennsylvania:

State COVID Page

https://www.dos.pa.gov/ProfessionalLicensing/BoardsCommissions/Medicine/Pages/default.aspx Application for a Temporary License

Rhode Island:

State COVID Page

South Carolina:

https://www.wbtv.com/2020/03/14/south-carolina-issue-emergency-nursing-medical-examiner-licenses-deal-with-coronavirus-pandemic/

South Dakota:

State COVID Page

Tennessee:

State COVID Page

Information obtained from Dr. Emily Cleveland-Job, TNDA, 3/23/2020.

https://www.tn.gov/content/dam/tn/health/documents/cedep/novel-coronavirus/Boards-Executive-Order-Form.pdf

Texas:

State COVID Page

https://www.kxxv.com/your-hometown/texas/gov-abbott-to-fast-track-temporary-licensing-of-out-of-state-medical-professionals TMB Response to Disaster Declaration

Utah:

State COVID Page

Vermont:

State COVID Page

Virginia:

State COVID Page

Emergency Operations Plan

https://www.dhp.virginia.gov/medicine/

Washington, DC:

State COVID Page

Washington state:

State COVID Page

Information obtained from Dr. Angela Ross, VP of WANP, and Dr. Shannon Braden, FNMRA, March 2020.

https://www.doh.wa.gov/Emergencies/NovelCoronavirusOutbreak2020/HealthcareProviders/EmergencyVolunteerHealthPractitioners

West Virginia:

State COVID Page

https://wvbom.wv.gov/Requirements.asp.

Wisconsin:

State COVID Page

Wyoming: