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February 3, 2026

The Honorable Susan R. Donovan, Chair  
House Committee on Health and Human Services  
State House  
82 Smith St.  
Providence, RI 02903

**RE: H 7425 - An Act Relating to Businesses and Professions - License of Naturopathy  
Act of 2017**

Dear Chair Donovan:

Please accept this letter regarding H 7425, legislation that would change the naming of Doctor of Naturopathy to Naturopathic Doctor (ND). The Rhode Island Department of Health (RIDOH) supports the name change but has concerns about the removal of language that requires a Naturopathic Doctor to collaborate with a physician and the expansion of a Naturopathic Doctor's scope of practice with respect to prescription drugs.

This bill expands the scope of practice for NDs by allowing them to advise patients regarding "possible drug-induced nutrient deficiencies" and on "safe ways to discontinue medications." NDs are not licensed to prescribe drugs based on the training they receive, and the scope of practice allowed in most states. With regard to prescription medications, NDs are currently only allowed to advise patients regarding possible dietary supplement/herb-prescription drug interactions. RIDOH agrees that it is within the scope of practice of a naturopathic doctor to discuss possible drug-induced nutrient deficiencies (which has been added to their scope of practice in the bill) but requests that any discontinuation of a medication prescribed by a provider (e.g., physician, physician assistant or certified nurse practitioner) be done in collaboration with the prescriber. Adding the words "in collaboration with the prescribing provider" after "safe ways to discontinue medications" in 5-36.1-18(4) would provide that safeguard for patients.

The bill also removes language that a ND must have a written collaboration and consultation agreement in place with a physician and adds a requirement that the ND "agree to refer patients and consult with other licensed healthcare providers, when medically indicated." As Rhode Island is currently one of only three states that require a written collaborative practice agreement with a licensed physician for NDs, and the modified language requires NDs to collaborate with the patient's own physician(s), RIDOH agrees with removing the requirement for a formal, written collaborative practice agreement with a single physician who may not have a physician-patient relationship with the patients under the care of the ND.

Should you have any additional questions, RIDOH would be happy to meet and discuss this bill language. Thank you for the opportunity to comment on this bill.

Sincerely,



Jerome M. Larkin, MD  
Director

CC: The Honorable Members of the House Committee on Health and Human Services  
The Honorable Julie A. Casimiro  
Nicole McCarty, Chief Legal Counsel  
Lynne Urbani, Director of House Policy