

# Naturopath Licensing and Prescriptive Authority in Other States

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## Issue

Provide information on which states (1) license or register naturopathic physicians (hereafter referred to as “naturopaths”), (2) grant naturopaths prescriptive authority, and (3) require naturopaths to work under a collaborative agreement with physicians.

## Summary

According to the [American Association of Naturopathic Physicians](#) (AANP), as of June 2023, 23 states and the District of Columbia have naturopathic physician licensure or registration laws. Sixteen of these states require a license to practice naturopathy while the other seven offer, but do not require, licensure or registration. Three states (Florida, South Carolina, and Tennessee) ban the practice of naturopathy.

Of the states that license or register naturopaths, we found 15 that grant them some type of prescriptive authority. Many states prohibit naturopathic physicians from prescribing controlled substances but allow them to prescribe (1) non-legend (over-the-counter) medications; (2) certain legend medications, such as epinephrine and antibiotics; and (3) prescription and non-prescription natural therapeutic substances (e.g., vitamins, minerals, and animal glandulars). However, eight states (Arizona, California, New Hampshire, New Mexico, Oregon, Utah, Vermont, and Washington) allow naturopathic physicians to prescribe limited controlled substances.

In addition, three states (Colorado, Maryland, and Rhode Island) require naturopaths to enter, or attempt to enter, into a written collaborative agreement with a licensed physician. Maryland and Rhode Island require this as a condition of licensure. Colorado only requires naturopaths to attempt

to do so if they are treating children up to age eight and the child has a relationship with a licensed pediatrician.

## Licensure or Registration

The [AANP](#) notes that, as of June 2023, the following 23 states and the District of Columbia have naturopathic physician licensure or registration laws: Alaska, Arizona, California, Colorado, Connecticut, Hawaii, Idaho, Kansas, Maine, Maryland, Massachusetts, Minnesota, Montana, New Hampshire, New Mexico, North Dakota, Oregon, Pennsylvania, Rhode Island, Utah, Vermont, Washington, and Wisconsin.

To obtain and maintain a state license or registration, naturopaths are generally required to (1) graduate from an accredited four-year residential naturopathic medical school, (2) pass the national Naturopathic Physicians Licensing Examination ([NPLEX](#)), (3) adhere to state scope of practice laws, and (4) meet ongoing state continuing education requirements.

According to the [American Naturopathic Certification Board](#), the following 16 states require a license to practice naturopathy: Alaska, Arizona, Connecticut, Hawaii, Kansas, Maine, Maryland, Massachusetts, Montana, New Hampshire, North Dakota, Oregon, Rhode Island, Utah, Vermont, and Washington.

The other seven states (California, Colorado, Idaho, New Mexico, Minnesota, Pennsylvania, and Wisconsin) offer, but do not require, licensure or registration. They generally allow unlicensed practitioners to practice naturopathy as a “naturopath,” “traditional naturopath,” or “complementary and alternative health care practitioner,” so long as they do not hold themselves out to be a state-licensed or -registered naturopathic physician.

Three states, Florida, South Carolina, and Tennessee, prohibit the practice of naturopathy ([Fla. Stat. § 458.305](#), [S.C. Code Ann. § 40-31-10](#), and [Tenn. Code Ann. § 63-6-205](#)).

## Prescriptive Authority

Of the states that license or register naturopathic physicians, we found 15 that grant naturopathic physicians some type of prescriptive authority.

Many states prohibit naturopathic physicians from prescribing controlled substances but allow them to prescribe (1) non-legend (over-the-counter) medications; (2) certain legend medications, such as epinephrine and antibiotics; and (3) prescription and non-prescription natural therapeutic substances (e.g., vitamins, minerals, and animal glandulars). Kansas and Maine require naturopathic physicians to enter into a written collaborative agreement with a licensed allopathic or osteopathic physician to prescribe legend drugs. (Maine limits the requirement to 12 months.)

However, we found eight states (Arizona, California, New Hampshire, New Mexico, Oregon, Utah, Vermont, and Washington) that allow naturopathic physicians to prescribe limited controlled substances. California and Vermont require them to do this under the supervision of a licensed allopathic or osteopathic physician. (Vermont requires this only for the first 100 prescriptions.) Vermont and Washington also require naturopathic physicians to complete certain training requirements in pharmacology in order to prescribe controlled and non-controlled prescription drugs.

Table 1 below lists information on the prescriptive authority and drug formularies for states that regulate naturopathic physicians.

**Table 1: Prescriptive Authority and Drug Formularies for Naturopathic Physicians**

State	Prescriptive Authority	Includes Controlled Substances	Notes
Alaska	No	No	N/A
Arizona	Yes ( <a href="#">Ariz. Rev. Stat. § 32-1581</a> )	Yes	<a href="#">Includes</a> natural substances, drugs (except Schedule II opioid controlled substances), and devices, under certain conditions
California	Yes ( <a href="#">Cal. Bus. and Prof. Code § 3640 et. seq.</a> )	Yes	<a href="#">Includes</a> herbs, nutrients, homeopathics, natural and synthetic hormones, legend and Schedule IV-V controlled substances, and Schedule III controlled substances (under supervision of an allopathic or osteopathic physician)
Colorado	Yes ( <a href="#">Colo. Rev. Stat. § 12-250-106</a> and <a href="#">4 C.C.R. § 749-1</a> )	No	<a href="#">Includes</a> epinephrine, barrier contraceptives (excluding intrauterine devices), oxygen, vitamins B6 and B12, vaccines, and nonprescription medications and devices appropriate within naturopathic medicine  Must have a written collaborative agreement with a licensed physician to treat a child age 8 or under
Connecticut	No	No	N/A
Hawaii	Yes ( <a href="#">Haw. Rev. Stat. § 455-6</a> )	No	<a href="#">Includes</a> non-prescription and prescription vitamins, minerals, supplements, botanicals, homeopathics, and biological substances; hormones (except testosterone); specified prescription medications (e.g., certain antibiotics, and pain medications)  Cannot administer medications in injectable form unless specifically authorized by the state board

Table 1 (continued)

State	Prescriptive Authority	Includes Controlled Substances	Notes
Idaho	Yes ( <a href="#">Idaho Code § 54-5102</a> )	No	<a href="#">Includes</a> only non-controlled legend medications, except that prescription testosterone may be used under certain conditions
Kansas	Yes ( <a href="#">Kan. Stat. Ann. § 65-7202</a> and <a href="#">Kan. Admin. Regs. § 100-72-8</a> )	No	Includes specified electrolytes, vitamins, minerals, amino acids, botanicals, lipids, chelators, allergy medication, and prescription epinephrine  Must be administered intravenously or intramuscularly pursuant to a written protocol with a physician
Maine	Yes ( <a href="#">32 Me. Rev. Stat. Ann. § 12522 (4)</a> and <a href="#">Code Me. R. § 502-6-3</a> )	No	<a href="#">Includes</a> non-controlled legend drugs (e.g., vitamins, minerals, and animal glandulars), non-controlled prescription topical antiseptic medications and anesthetics, contraceptives (except intrauterine devices), homeopathics, and immunizations  Vitamins, minerals, and medications may be administered via intramuscular injections. Must first complete a 12-month collaborative agreement with a licensed allopathic or osteopathic physician before they can prescribe independently.
Maryland	Yes ( <a href="#">Md. Code Ann. Health Occ. § 14-5F-04.1</a> )	No	<a href="#">Includes</a> natural medicines (e.g., vitamins, minerals, homeopathics, amino acids, and botanicals); prescription epinephrine, oxygen, diaphragms, and cervical caps; and FDA-regulated non-prescription drugs and devices
Massachusetts	No	No	N/A (The state has not yet implemented its licensing program, which was enacted in 2017. See <a href="#">Mass. Gen. Laws ch. 112 § 267.</a> )
Minnesota	No	No	N/A
Montana	Yes ( <a href="#">Mont. Code Ann. § 37-26-301</a> , as amended by <a href="#">2023 SB 101</a> , and <a href="#">Mont. Admin. R. § 24.111.511</a> )	No	<a href="#">Includes</a> amino acids, homeopathics, whole gland thyroid, prescription antifungals and antibiotics, barrier contraceptives, botanicals, oxytocin, electrolytes and fluid replacement, expectorants and mucolytics, digestive and proteolytic enzymes, homeopathics, prescription hormones, prescription and non-prescription vitamins and minerals, childbirth preparations, topical medicines, and various other medications (e.g., blood thinners, oxygen, and vaccines)

Table 1 (continued)

State	Prescriptive Authority	Includes Controlled Substances	Notes
New Hampshire	Yes ( <a href="#">N.H. Rev. Stat. Ann. §§ 328-E:4 &amp; E:16</a> )	Yes	<a href="#">Includes</a> amino acids; animal glandulars; legend medications (e.g., anti-gout medications, antihistamines, antibiotics, antibacterials, antifungals, etc.); certain controlled substances, such as amphetamines, anabolic steroids, sedatives, and hypnotics; anesthetics; and vaccines
New Mexico	Yes ( <a href="#">N. M. Stat. Ann. § 61-12G-6</a> and <a href="#">N.M. Admin. Code § 16.10.22.11</a> )	Yes	<a href="#">Includes</a> all legend drugs; testosterone; Schedule III, IV, and V controlled substances (excluding opioids and benzodiazepines); and intramuscular, intravenous, intradermal, and intra-articular injections of substances appropriate to naturopathic medicine (e.g., vitamin and mineral injections)  Must pass a pharmacy examination approved by the state medical board to be eligible to prescribe the above substances
North Dakota	No	No	N/A
Oregon	Yes ( <a href="#">Or. Rev. Stat. § 685.145</a> , <a href="#">O.B.N.M. § 850-060-0210 et. seq.</a> )	Yes	Includes all prescription drugs, including Schedule III, IV, and V controlled substances, that are <a href="#">listed</a> in the current American Hospital Formulary Service Pharmacologic-Therapeutic Classification with certain <a href="#">exceptions</a> . (Includes a wide range of prescription drugs used to provide primary care.)  Must complete education and reporting <a href="#">requirements</a> for injection and intravenous therapy
Pennsylvania	No	No	N/A (The state has not yet implemented its registration program, which was enacted in 2016, See <a href="#">HB 516</a> )
Rhode Island	No	No	N/A
Utah	Yes ( <a href="#">Utah Code Ann. § 58-71-102(12)</a> and <a href="#">Utah Admin. Code § R156-71-202</a> )	Yes	<a href="#">Includes</a> non-controlled legend drugs deemed appropriate for primary care, such as antihistamines, antibacterials, antifungals, antivirals, hormones (except testosterone), local anesthetics, cardiac medications, and oxygen. Also includes prescription and non-prescription vitamins, minerals, homeopathics, botanicals, and thyroid glandulars.  Includes one controlled substance (testosterone)

Table 1 (continued)

State	Prescriptive Authority	Includes Controlled Substances	Notes
Vermont	Yes ( <a href="#">26 Vt. Stat. Ann. § 4121</a> and <a href="#">Vt. Code R. §§ 04-030-380</a> and <a href="#">381</a> )	Yes	<p><a href="#">Includes</a> controlled substances considered “natural medicines” (i.e., not artificial or man-made). Also includes amino acids, antibiotics, antimicrobials, antifungals, antivirals, hormones, vitamins, minerals, botanicals, homeopathics, among others.</p> <p>To receive prescriptive authority, naturopathic physicians must obtain a special endorsement for prescription medications</p> <p>To obtain the endorsement, must complete a pharmacology exam and 10 hours of pharmacology continuing education biennially. The first 100 prescriptions issued must be reviewed by a supervising physician pursuant to a written collaborative agreement.</p>
Washington	Yes ( <a href="#">Wash. Rev. Code § 18.36A</a> and <a href="#">Wash. Admin. Code §§ 246-836-210</a> and <a href="#">211</a> )	Yes	<p>Includes non-legend drugs, legend drugs (except Botox and inert substances used for cosmetic purposes), and limited controlled substances (codeine and testosterone products)</p> <p>Must complete pharmacology education <a href="#">requirements</a> and register with the federal Food and Drug Administration in order to prescribe controlled substances</p>
Wisconsin	No	No	N/A

## Collaborative Agreements

We found three states (Colorado, Maryland, and Rhode Island) that require naturopaths to enter, or attempt to enter, into a written collaborative agreement with a licensed physician. Maryland and Rhode Island require this as a condition of licensure ([Md Code, Health Occupations, § 14-5F-12](#) and [R.I. Gen. Laws § 5-36.1-12](#)). Colorado requires naturopaths to attempt to do so only if they are treating children up to age eight and the child has a relationship with a licensed pediatrician ([Colo. Rev. Stat. Ann. § 12-250-106](#)).

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