

When evidence was provided that naturopaths were passing themselves off as physicians in the 2017 session, legislators reasoned that **“ND” looked too much like “MD”** and that adding “registered” to their title was in the **interest of public safety**.

But exposing these violations did not stop naturopaths from presenting themselves to the public as “physicians.” Nor did an expose’ by Denver CBS News in August 2017.

**A follow up survey** of business websites in **October 2017** found that **34 RNDs were still referring to themselves as physicians, and another 22 were using terms that would clearly induce the public to believe they are medical doctors**. These are violations of both the medical and naturopathic practices acts. I filed a complaint at that time with DORA about these violations.

Earlier this session, with the first naturopath bill attempting to do away with the RND title, a senate committee was told that I filed complaints against RNDs who merely posted their membership in the American Association of Naturopathic Physicians or their licensure as a “Naturopathic Physician” in another state. **I did not**. As these are truthful statements, they were not part of my inclusionary criteria.

**27 of the 34 RNDs** who were claiming to be “physicians” have **very recently** removed those claims from their websites, so apparently DORA agreed with the grounds of my complaint.

Now, what to do about the RND title. **Is it confusing?** How would naturopath know since so few have adhered to the law and adopted this title. **Three months ago only 20 naturopaths could be found using the RND title**. So if the RNDs claim the title is confusing to the public, I would ask how do they know? Where is their evidence?

Furthermore, “RND” is not a title that any nurse would properly use, because you don’t combine a licensure status (RN) with an academic status (D). Doctoral level nurse use the DNP title -- **Doctorate of Nursing Practice**. (Note that in those states where naturopaths can use the title NP for Naturopathic Physician never complain that they are confused with the NP for nurse practitioner)

In conclusion, the whole notion behind professional regulation is to improve public safety. **The RND title improves public awareness and safety**.

**But there is another solution**. The RNDs’ sunset review starts in October 2018. I suggest this bill be abandoned, allowing the sunset review process to address the issue of protected titles.

Testimony by Linda Rosa, RN  
1 May 2018