Summary: NDs are important members of the primary care provider network as follows:

- WA State Labor and Industries, Health Care Authority, and Public Assistance cover NDs as PCPs.
- **Regence Innova small group plan**: Naturopathic Physicians are included as physicians performing primary care services under the Regence Innova small group plan that was selected as the state’s benchmark reference plan for the Exchange. WAC 284-43-865. Innova defines a Physician as an individual who is duly licensed as a doctor of medicine (M.D.), doctor of osteopathy (D.O.) or doctor of naturopathic medicine (N.D.) who is a Provider covered under the Contract.
- **Exchange Non-PPO Private Insurance plans** cover NDs as PCP Physicians: Bridge Span Health Co. (Cambia’s Regence individual Exchange Plan); Lifewise Health Plan of WA (subsidiary of Premera Blue Cross); Premera.
- **Exchange Medicaid Insurance plans** cover ND PCP services: Coordinated Care Corp.; Community Health Plan of Washington; Molina Healthcare of Washington.
- NDs help meet the growing need for PCPs resulting from the shortage of PCP providers with implementation of the Affordable Care Act.
- The majority of ND medical students at Bastyr University are interested in practicing in rural and underserved areas (2011 survey).
- **Puget Sound Health Alliance** rated 40 medical groups in 2011-12 with clinics in 156 locations across Puget Sound and **Bastyr University Clinic rated #1** for Getting Timely Appointments, Care and Information; and in How Well Providers Communicate with Patients; #2 for Helpful, Courteous and Respectful Office Staff; and #3 in Patient’s Rating and Overall Ratings of Providers. In 2013-2014, Bastyr tied with 4 other medical groups out of 46 for Patient Experience – Overview of Medical Group Results.
- **Naturopathic Physicians medical education** includes four-year post graduate medical clinical education at accredited medical schools and is comparable to that offered at allopathic medical schools (MD and DO), exceeds that of other primary care health professions (ARNP and PA), and costs are equivalent to allopathic medical school.

**ND COVERED AS PCPs UNDER EXCHANGE CARRIER PLANS**


A not grandfathered individual or small group health benefit plan offered, issued, amended or renewed on or after January 1, 2014, must, at a minimum, include coverage for essential health benefits. "Essential health benefits" means all of the following:

(1) The benefits and services covered by health care service contractor **Regence Blue Shield as the Innova small group plan** policy form, policy form number WW0711CCONMS, and certificate form number WW0112BINNS, offered during the first quarter of 2012. The SERFF filing number is RGWA-127372701.

**NOTE:** Regence Innova is the small group plan that was selected as the state’s benchmark reference plan for the Exchange. **Naturopathic Physicians (NDs) are included as primary care Physicians (PCPs)** under Regence Innova: **Physician means** an individual who is duly licensed as a doctor of medicine (M.D.), doctor of osteopathy (D.O.) or **doctor of naturopathic medicine (N.D.)** who is a Provider covered under the Contract.
NOTE: Exchange Non-PPO Private Insurance plans cover NDs as PCP Physicians: Bridge Span Health Co. (Cambia’s Regence individual Exchange Plan); Lifewise Health Plan of WA (subsidiary of Premera Blue Cross); Premera.

NOTE: Exchange Medicaid Insurance plans cover ND PCP services: Coordinated Care Corp.; Community Health Plan of Washington; Molina Healthcare of Washington.

**NDs COVERED AS PCPS UNDER HEALTH CARE AUTHORITY**

SB 5034 - Making 2013-2015 operating appropriations. (Hill, Hargrove; By Request: Governor Gregoire)

**18 NEW SECTION. Sec. 213. FOR THE STATE HEALTH CARE AUTHORITY**

The appropriations in this section are subject to the following conditions and limitations:
- Within the amounts appropriated in this section, the authority shall reimburse for primary care services provided by naturopathic physicians.

**WSR 13-20-031 HEALTH CARE AUTHORITY** [Filed September 23, 2013, 3:09 p.m.] NOTICE

Title or Subject: Medicaid State Plan Amendment (SPA) 13-28. Effective Date: January 1, 2013. Description: The agency intends to submit medicaid SPA 13-28 to:
- Comply with the state budget approved by the legislature in ESSB 5034, which recognizes naturopathic physicians as physicians who can enroll with medicaid and bill medicaid for physician-related primary care services provided to medicaid clients.
- The agency anticipates no increase in annual aggregate expenditures associated with recognizing naturopathic physicians as medicaid providers.

**WAC 182-502-0002 HEALTH CARE AUTHORITY. ADMINISTRATION OF MEDICAL PROGRAMS— PROVIDERS**

Eligible provider types. The following health care professionals, health care entities, suppliers or contractors of service may request enrollment with the Washington state health care authority (medicaid agency) to provide covered health care services to eligible clients. For the purposes of this chapter, health care services include((s)) treatment, equipment, related supplies, and drugs.

1) Professionals: .... (p) **Naturopathic physicians**;

**NDs COVERED AS PCPS UNDER LABOR AND INDUSTRIES PLANS**

WAC 296-20-01010 Labor and Industries, Department of. Medical Aid Rules. Scope of health care provider network.

.... (2) As of January 1, 2013, the **following types of health care providers** (hereafter providers) must be enrolled in the network with an approved provider agreement to provide and be reimbursed for care to injured workers in Washington state beyond the initial office or emergency room visit:

(a) Medical physicians and surgeons;
(b) Osteopathic physicians and surgeons;
(c) Chiropractic physicians;
(d) **Naturopathic physicians**;

... (h) Advanced registered nurse practitioners; and
(i) Physician assistants.
... (4) The department may phase implementation of the network to ensure access within all geographic areas. The director of the department shall determine, at his/her discretion, whether to establish or expand the network, after consideration of at least the following:

• The percent of injured workers statewide who have access to at least five primary care providers within fifteen miles, compared to a baseline established within the previous twelve months;


... Attending provider: For these rules, means a person licensed to independently practice one or more of the following professions: Medicine and surgery; osteopathic medicine and surgery; chiropractic; naturopathic physician; podiatry; dentistry; optometry; and advanced registered nurse practitioner. An attending provider actively treats an injured or ill worker.

... Doctor or attending doctor: For these rules, means a person licensed to independently practice one or more of the following professions: Medicine and surgery; osteopathic medicine and surgery; chiropractic; naturopathic physician; podiatry; dentistry; optometry. An attending doctor is a treating doctor.

... Health services provider or provider: For these rules means any person, firm, corporation, partnership, association, agency, institution, or other legal entity providing any kind of services related to the treatment of an industrially injured worker. It includes, but is not limited to, hospitals, medical doctors, dentists, ... osteopathic physicians, ... naturopathic physicians, and durable medical equipment dealers.

WAC 296-23 LABOR AND INDUSTRIES, DEPARTMENT OF; Radiology, radiation therapy, nuclear medicine, pathology, hospital, chiropractic, physical therapy, drugless therapeutics and nursing -- Drugless therapeutics, etc.

NATUROPATHIC PHYSICIANS

296-23-205 General instructions -- Naturopathic physicians.

296-23-215 Office visits and special services—Naturopathic physicians.

WAC 296-17A-6109 DEPARTMENT OF LABOR AND INDUSTRIES; Classification 6109. 6109-00 Physicians, surgeons, and medical clinics, N.O.C.

6109-04 Naturopaths, N.O.C. Applies to establishments of health practitioners not covered by another classification (N.O.C.) who diagnose, treat, and care for patients, using a system of practice that bases treatment of physiological functions and abnormal conditions on natural laws governing the human body, relying on natural remedies such as, but not limited to, acupuncture, sunlight supplemented with diet, and naturopathic corrections and manipulations to treat the sick. This classification includes clerical office and sales personnel, as well as other employees engaged in service in the naturopath's office.

NDs INCLUDED AS PCPS UNDER PUBLIC ASSISTANCE

RCW 74.09.010 Public Assistance. Public Assistance; Medical care. Definitions

The definitions in this section apply throughout this chapter unless the context clearly requires otherwise.

(1) "Children's health program" ....

(10) "Health home" or "primary care health home" means coordinated health care provided by a licensed primary care provider coordinating all medical care services, and a multidisciplinary health care team comprised of clinical and nonclinical staff. The term "coordinating all medical care services"
shall not be construed to require prior authorization by a primary care provider in order for a patient to receive treatment for covered services by an optometrist licensed under chapter 18.53 RCW. Primary care health home services shall include those services defined as health home services in 42 U.S.C. Sec. 1396 w-20 and, in addition, may include, but are not limited to:

(18) "Primary care provider" means a general practice physician, family practitioner, internist, pediatrician, osteopath, naturopath, physician assistant, osteopathic physician assistant, and advanced registered nurse practitioner licensed under Title 18 RCW.

RCW 74.09.470 Public assistance. Children's affordable health coverage -- Department duties. (6) ...The department shall collaborate with the department of health, local public health jurisdictions, the office of [the] superintendent of public instruction, the department of early learning, .... The outreach and education effort shall include the following components:
(e) Development and dissemination of materials to engage and inform parents and families statewide on issues such as: The benefits of health insurance coverage; the appropriate use of health services, including primary care provided by health care practitioners licensed under chapters 18.71, 18.57, 18.36A (naturopathic physician), and 18.79 RCW, and emergency services; the value of a medical home, well-child services and immunization, and other preventive health services with linkages to department of health child profile efforts; identifying and managing chronic conditions such as asthma and diabetes; and the value of good nutrition and physical activity;

NDs INCLUDED AS PCPs UNDER DEPARTMENT OF LICENSING
WAC 308-96B-010 DEPARTMENT OF LICENSING; Definitions—Individual with disabilities special parking privileges.
For the purposes of determining eligibility under RCW 46.16.381, for individual with disabilities special parking placards and license plates, the following definitions apply:
(1) "Application for individual" means the form provided by the department that must be completed by the individual and physician.
(4) "Licensed physician" is a health care provider to include: ... naturopath (ND) ....

NDs AS PRIMARY CARE PROVIDERS UNDER RCW AND WAC
RCW 18.06.140 BUSINESSES AND PROFESSIONS East Asian medicine practitioners.
Consultation and referral to other health care practitioners.
(2) When a person licensed under this chapter sees patients with potentially serious disorders such as cardiac conditions, acute abdominal symptoms, and such other conditions, the practitioner shall immediately request a consultation or recent written diagnosis from a primary health care provider licensed under chapter 18.71, 18.57, 18.57A, 18.36A, or 18.71A RCW or RCW 18.79.050.

WAC 246-803-010 DEPARTMENT OF HEALTH. East Asian Medicine Practitioner Definitions.
The definitions in this section apply throughout this chapter unless the context clearly requires otherwise:
(10) "Primary health care provider" is an individual licensed under:
(a) Chapter 18.36A RCW, Naturopathy;
(b) Chapter 18.57 RCW, Osteopathy—Osteopathic medicine and surgery;
(c) Chapter 18.57A RCW, Osteopathic physicians' assistants;
(d) Chapter 18.71 RCW, Physicians;
(e) Chapter 18.71A RCW, Physician assistants; or
**RCW 18.79.050, "Advanced registered nursing practice" defined—Exceptions**

**WAC 246-338-020 Department of Health, Licensure—Types of medical test site licenses.**

After July 1, 1990, any person advertising, operating, managing, owning, conducting, opening, or maintaining a medical test site must first obtain a license from the department. License types are described in Table 020-1.

(2) Provider performed microscopic procedures (PPMP) ....

(a) PPMP may be performed only by one of the following licensed professionals: ... (v) Naturopath licensed under chapter 18.36A RCW, Naturopathy ....

**HB 2549 (2008) Establishing a patient-centered primary care collaborative program (Seaquist).**

NEW SECTION. Sec. 1. The legislature finds that our primary care system is severely faltering and the number of people choosing primary care as a profession is decreasing dramatically. **Primary care providers** include family medicine and general internal medicine physicians, pediatricians, naturopathic physicians, advanced registered nurse practitioners, and physician assistants.

**NDs PERFORMING PCP SERVICES**

**RCW 28A.210.090 COMMON SCHOOL PROVISIONS. Immunization program — Exemptions.**

(1) Any child shall be exempt in whole or in part from the immunization measures required by RCW 28A.210.060 through 28A.210.170 upon the presentation of any one or more of the certifications required by this section, on a form prescribed by the department of health:

(a) A written certification signed by a health care practitioner that a particular vaccine required by rule of the state board of health is, in his or her judgment, not advisable for the child: PROVIDED, That when it is determined that this particular vaccine is no longer contraindicated, the child will be required to have the vaccine;

(3) For purposes of this section, "health care practitioner" means a physician licensed under chapter 18.71 or 18.57 RCW, a naturopath licensed under chapter 18.36A RCW, a physician assistant licensed under chapter 18.71A or 18.57A RCW, or an advanced registered nurse practitioner licensed under chapter 18.79 RCW.

**RCW 69.51A.010 FOOD, DRUGS, COSMETICS, AND POISONS Medical marijuana. Definitions.**

(2) "Health care professional," for purposes of this chapter only, means a physician licensed under chapter 18.71 RCW, a physician assistant licensed under chapter 18.71A RCW, an osteopathic physician licensed under chapter 18.57 RCW, an osteopathic physicians' assistant licensed under chapter 18.57A RCW, a naturopath licensed under chapter 18.36A RCW, or an advanced registered nurse practitioner licensed under chapter 18.79 RCW.

(3) "Medical use of marijuana" means the production, possession, or administration of marijuana, as defined in *RCW 69.50.101(q), for the exclusive benefit of a qualifying patient in the treatment of his or her terminal or debilitating illness.

(4) "Qualifying patient" means a person who:

(a) Is a patient of a health care professional;

(b) Has been diagnosed by that health care professional as having a terminal or debilitating medical condition;

**RCW 70.02.230 PUBLIC HEALTH AND SAFETY Mental health services, confidentiality of records — Permitted disclosures. (Effective July 1, 2014.)**
(2) Information and records related to mental health services, other than those obtained through treatment under chapter 71.34 RCW, may be disclosed only:  
  (t) Consistent with the requirements of the federal health information portability and accountability act, to a licensed mental health professional or a health care professional licensed under chapter 18.71, 18.71A, 18.57, 18.57A, 18.79, or 18.36A RCW who is providing care to a person, or to whom a person has been referred for evaluation or treatment, to assure coordinated care and treatment of that person. Psychotherapy notes, as defined in 45 C.F.R. Sec. 164.501, may not be released without authorization of the person who is the subject of the request for release of information;

**RCW 70.185.090 PUBLIC HEALTH AND SAFETY. MENTAL ILLNESS Community contracted student educational positions.**

(1) The department may develop a mechanism for underserved rural or urban communities to contract with education and training programs for student positions above the full time equivalent lids. The goal of this program is to provide additional capacity, educating students who will practice in underserved communities.

(2) Eligible education and training programs are those programs approved by the department that lead to eligibility for a credential as a credentialed health care professional. Eligible professions are those licensed under chapters 18.36A, 18.57, 18.57A, 18.71, and 18.71A RCW and advanced registered nurse practitioners and certified nurse midwives licensed under *chapter 18.88 RCW, and may include other providers identified as needed in the health personnel resource plan.

**RCW 71.05.630 MENTAL ILLNESS Treatment records -- Confidential -- Release (as amended by 2009 c 398).(Effective until July 1, 2014.)**

(2) Treatment records of a person may be released without informed written consent in the following circumstances:

(i) Consistent with the requirements of the health information portability and accountability act, to a licensed mental health professional, as defined in RCW 71.05.020, or a health care professional licensed under chapter 18.71, 18.71A, 18.57, 18.57A, 18.79, or 18.36A RCW who is providing care to a person, or to whom a person has been referred for evaluation or treatment, to assure coordinated care and treatment of that person. Psychotherapy notes, as defined in 45 C.F.R. Sec. 164.501, may not be released without authorization of the person who is the subject of the request for release of information.

**RCW 18.250.010 ATHLETIC TRAINERS Definitions.**

The definitions in this section apply throughout this chapter unless the context clearly requires otherwise.

(7) "Licensed health care provider" means a physician, physician assistant, osteopathic physician, osteopathic physician assistant, advanced registered nurse practitioner, naturopath, physical therapist, chiropractor, dentist, massage practitioner, acupuncturist, occupational therapist, or podiatric physician and surgeon.

**RCW 67.08.002 SPORTS AND RECREATION — CONVENTION FACILITIES Boxing, martial arts, and wrestling. Definitions.**

The definitions in this section apply throughout this chapter unless the context clearly requires otherwise. (18) "Physician" means a person licensed under chapter 18.57, 18.36A, or 18.71 RCW as a
physician or a person holding an osteopathic or allopathic physician license under the laws of any jurisdiction in which the person resides.

**WAC 182-531-1720 Tobacco cessation counseling. NEW SECTION**

(1) The medicaid agency covers tobacco cessation services when delivered by qualified providers through the agency contracted quitline or face-to-face office visits for tobacco cessation for pregnant clients.

(2) The agency pays for face-to-face office visits for tobacco cessation counseling for pregnant clients with the following limits:

(a) When provided by physicians, advanced registered nurse practitioners (ARNPs), physician assistants-certified (PA-Cs), **naturopathic physicians**, and dentists; ...
The definitions in this section apply throughout this chapter unless the context clearly requires otherwise.

(1) "Delegation" means direct authorization granted by a licensed health care practitioner to a medical assistant to perform the functions authorized in this chapter which fall within the scope of practice of the health care provider and the training and experience of the medical assistant.

(3) "Health care practitioner" means: ....
   (c) Acting within the scope of their respective licensure, ... a naturopath licensed under chapter 18.36A RCW, ....

(9) "Supervision" means supervision of procedures permitted pursuant to this chapter by a health care practitioner who is physically present and is immediately available in the facility. The health care practitioner does not need to be present during procedures to withdraw blood, but must be

Health Care Assistant

RCW 18.135.020 Health care assistants. Definitions. (Effective until July 1, 2016.)
The definitions in this section apply throughout this chapter unless the context clearly requires otherwise.

(1) "Delegation" means direct authorization granted by a licensed health care practitioner to a health care assistant to perform the functions authorized in this chapter which fall within the scope of practice of the delegator and which are not within the scope of practice of the delegatee.

(2) "Health care assistant" means an unlicensed person who assists a licensed health care practitioner in providing health care to patients pursuant to this chapter ....

(4) "Health care practitioner" means: ....
   (c) Acting within the scope of their respective licensure, ... a naturopath licensed under chapter 18.36A RCW, ....

(6) "Supervision" means supervision of procedures permitted pursuant to this chapter by a health care practitioner who is physically present and is immediately available in the facility during the administration of injections or vaccines, as defined in this chapter, or certain drugs as provided in RCW 18.135.130, but need not be present during procedures to withdraw blood.

Occupational Therapist

RCW 18.59.100 Occupational therapy. Duty to refer medical cases.
An occupational therapist shall, after evaluating a patient and if the case is a medical one, refer the case to a physician for appropriate medical direction if such direction is lacking. Treatment by an occupational therapist of such a medical case may take place only upon the referral of a physician, osteopathic physician, podiatric physician and surgeon, naturopath, chiropractor, physician assistant, psychologist, or advanced registered nurse practitioner licensed to practice in this state.

Surgical Technologist

WAC 246-939-010 DEPARTMENT OF HEALTH. Who can delegate to a surgical technologist? Health care practitioners who may delegate as referenced in RCW 18.215.010 and include:(8) Naturopathic physicians as licensed under chapter 18.36A RCW. RCW 18.215.010(3) "Surgical technologist" means a person, regardless of title, who is supervised in the surgical setting under the delegation of authority of a health care practitioner acting within the scope of his or her license and under the laws of this state.
Genetic Counselors
WAC 246-825-010 DEPARTMENT OF HEALTH. GENETIC COUNSELORS Agency filings affecting this section. Definitions.
The definitions in this section apply throughout this chapter unless the context clearly requires otherwise. (7) "Licensed health care provider" means a physician licensed under chapter 18.71 RCW, physician assistant licensed under chapter 18.71A RCW, osteopathic physician licensed under chapter 18.57 RCW, osteopathic physician assistant licensed under chapter 18.57A RCW, advanced registered nurse practitioner licensed under chapter 18.79 RCW, or naturopathic physician licensed under chapter 18.36A RCW.

ND AUTHORITY UNDER RCW AND WAC
RCW 18.36A BUSINESSES AND PROFESSIONS. Naturopathy

RCW 7.70.100 SPECIAL PROCEEDINGS AND ACTIONS Mandatory mediation of health care claims -- Procedures.
NOTES: Findings -- Intent -- Part headings and subheadings not law -- Severability -- 2006 c 8: See notes following RCW 5.64.010.
Medical malpractice review -- 1993 c 492: "(1) The administrator for the courts shall coordinate a collaborative effort to develop a voluntary system for review of medical malpractice claims by health services experts prior to the filing of a cause of action under chapter 7.70 RCW.

(m) Washington association of naturopathic physicians; and

Comparison of Scope of Practice and Professional Education

<table>
<thead>
<tr>
<th>Primary Care Provider Type</th>
<th>Naturopathic (ND)</th>
<th>Medical (MD)</th>
<th>Advanced Registered Nurse Practitioners (ARNP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope of Practice</td>
<td>General diagnosis and management of any condition (Co-management of cancer)</td>
<td>General diagnosis and management of any condition</td>
<td>General diagnosis and management of any condition</td>
</tr>
<tr>
<td>Prescriptive Authority</td>
<td>Can prescribe all legend drugs</td>
<td>Can prescribe all legend drugs</td>
<td>Can prescribe all legend drugs</td>
</tr>
<tr>
<td>Controlled Substances</td>
<td>Limited to testosterone and codeine compounds in Schedule III – V</td>
<td>Can prescribe Schedule II – V drugs</td>
<td>Can prescribe Schedule II – V drugs</td>
</tr>
<tr>
<td>Surgery</td>
<td>Can perform minor surgery and office</td>
<td>Can perform surgery and office</td>
<td>Can perform minor surgery and office</td>
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## Primary Care Status

<table>
<thead>
<tr>
<th>Procedures</th>
<th>Recognized as primary care providers in Washington statutes</th>
<th>Recognized as primary care providers in Washington statutes</th>
<th>Recognized as primary care providers in Washington statutes</th>
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</table>

## Education*

<table>
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<tr>
<th>Undergrad Prerequisites</th>
<th>45 credits in science (no degree required)</th>
<th>48 credits in science (no degree required)</th>
<th>Bachelor’s of Science in Nursing (BSN) degree required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Graduate Credits</td>
<td>Bachelor’s of Science in Nursing (BSN) degree required</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Credits</td>
<td>314 (Doctorate: Naturopathic Medicine)</td>
<td>312 (Doctorate: Medicine)</td>
<td>68-71 (MSN - Primary Nurse Practitioner)</td>
</tr>
</tbody>
</table>

* Does not include residency training comparisons.


ND-MD-ARNPcomparison/educationrel:rm06.30.09

## NATUROPATHIC PHYSICIAN PANEL/COMMITTEE PARTICIPATION

**Vaccine Advisory Committee:** Dr. Jonathan Bell, V.A.C. member

**Washington State Health Technology Assessment Clinical Committee:** Dr. Michelle Simon, ND/PHD, Committee member.

**Washington State Health Information Infrastructure Stakeholder Advisory Committee:** David Deichert, ND, Co-Chair of Advisory Committee to the Health Information Infrastructure Advisory Board.

**Primary Care Coalition** (HB 2549 patient-centered primary care collaborative program) Eva Miller, ND/eric Oberg, ND/Jonathan Bell, ND, participants.

**BRC Panel on Prevention and Health Promotion:** Ryan Bradley, ND, Panel member and contributor.

## NATUROPATHIC PHYSICIAN LICENSE