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**Board of Registration in Naturopathy**

**Guidance regarding Naturopathy Scope of Practice**

Board regulation 273 CMR 4.02 states:

(1) *The practice of naturopathic health care shall include, but is not limited to:*

- (a) *The prevention and treatment of human illness, injury or disease through education, dietary or nutritional advice and the promotion of healthy ways of living.*
- (b) *The performance of noninvasive physician examinations and the ordering of clinical and laboratory procedures from licensed clinics or laboratories to evaluate injuries, illnesses and conditions in the human body.*
- (c) *Dispensing, administering, ordering and prescribing natural medicines of mineral, animal or botanical origin, including food products or extracts, vitamins, minerals, enzymes, digestive aids, natural hormones, plant substances, homeopathic preparations, natural antibiotic, topical medicines and nonprescription drugs, therapeutic devices and barrier contraceptives to prevent or treat illnesses, injuries and conditions of the human body.*
- (d) *The use of manual mechanical manipulation of the body structures or tissues in accordance with naturopathic principles.*
- (e) *The use of naturopathic physician medicine to maintain or restore physiological functioning of the human body.*

(2) *The practice of naturopathic healthcare shall not include:*

- (a) *The performance of surgeries or invasive procedures or examinations, abortions or the use of radiation, radioactive substances or local, general or spinal anesthesia.*
- (b) *The prescribing dispensing or administering a drug classified as a controlled substance or prescription drug under M.G.L. c. 94C.*
- (c) *The practice of acupuncture or traditional Chinese medicine.*
- (d) *The practice of emergency medicine, except as a person rendering gratuitous services in an emergency or for the care of minor injuries.*

The Board of Registration in Naturopathy is issuing this guidance to further describe this scope of practice.

February 2024

## **Invasive versus Non-Invasive**

A naturopathic doctor may perform and/or order laboratory and procedural tests to arrive at a diagnosis, assessment, or to follow progression of disease.

### **Examples:**

- A naturopathic doctor can order laboratory tests to have better understanding of what is happening organically with a patient; however, they cannot render a medical opinion outside of their scope of practice.
- A naturopathic doctor can order X-rays for a patient; however, they cannot interpret the findings unless they are dually licensed as a radiologist.

With respect to examinations, non-invasive includes conducting physical and orificial examinations of oral, nasal, auricular, ocular, rectal, and vaginal cavities.

With respect to routes of administration, non-invasive includes administration of medication via oral, nasal, auricular, ocular, rectal, vaginal, topical, transdermal, intradermal, subcutaneous routes.

The examples in this document are not exhaustive. Licensees should consult statute, regulation, and Board policy for additional guidance.

## **Radiography**

Radiography means imaging studies, including but not limited to computed tomography scans, x-rays, magnetic resonance imaging, positron emission tomography scans, mammogram, bone densitometry, and ultrasounds.

A naturopathic doctor must order radiological examinations and treatments from appropriately licensed clinics or laboratories that offer radiation/radioactive interventions. A naturopathic doctor may order a test but can only administer a test if they are also separately licensed to perform such tests under existing licenses that allow for that scope.

## **Medications**

A naturopathic doctor may not prescribe, dispense, or administer any medication classified as a controlled substance or prescription drug.

In other words, if the medication requires a prescription, then it falls out of the scope of practice of naturopathic doctors. If the medication is over-the-counter (“OTC”), then it falls within the scope of practice of naturopathic doctors.

## Antibiotics

A naturopathic doctor may prescribe, dispense, or administer antibiotics that do not require a prescription, such as tea tree oil and over-the-counter products such as Neosporin (bacitracin).

A naturopathic doctor may not prescribe, dispense, or administer antibiotics that require a prescription, such as levofloxacin, amoxicillin, or penicillin.

## Hormones

A naturopathic doctor may prescribe, dispense, or administer hormones that do not require a prescription, such as glandular (desiccated) productions that have not gone through FDA registration.

A naturopathic doctor may not prescribe, dispense, or administer hormones that require a prescription, such as Synthroid (levothyroxine).

**Please note: The same active ingredient may exist in two separate products, one within the scope and one outside the scope of practice of naturopathic doctors.** Taking thyroid hormone as example, if a glandular (desiccated) product does not need a prescription then it falls within the scope of practice, and if a similar product needs a prescription, then it does not fit within the scope of practice. As an example, desiccated thyroid may be found in many grocers, without prescription, and therefore fits within the scope of practice of naturopathic doctors. However, and continuing this example, Armour Thyroid, which is also desiccated thyroid derived, is a prescription product, and therefore does not fit within the scope of practice of naturopathic medicine.

## Vitamins and Supplements

Vitamins and supplements might also present a point of confusion, depending on the route of administration. Generally, vitamins and many supplement products when taken in an ORAL form may fall within the scope of practice of naturopathic doctors, as being either OTC or fitting within the Dietary Supplement Health and Education Act of 1994 (DSHEA).

However, the INJECTABLE forms of vitamins and supplements are Schedule VI controlled substances in Massachusetts and fall outside the scope of practice for naturopathic doctors. As an example, the oral form of Vitamin C (ascorbic acid) falls within the scope of practice of naturopathic medicine. However, the injectable forms fall outside the scope of practice of naturopathic medicine in the Commonwealth.

## Contraception

A naturopathic doctor may order and prescribe barrier contraceptives, including but not limited to condoms, diaphragms, cervical caps, and contraceptive sponges.

A naturopathic doctor may not order or prescribe other forms of contraception, such as intrauterine devices (IUDs), oral hormonal contraceptives, or hormonal contraceptive patches.

### Colonics

A naturopathic doctor may order over-the-counter colonics to aid patients with symptoms of indigestion and relieve mild pain and discomfort.