Allison Willette

12 Arrowhead Dr.

Hadley MA 01035

413-800-4868

I am the president of the Massachusetts Society of Naturopathic Doctors, the affiliate of the American Association of Naturopathic Physicians. I am also the state representative for our associations House of Delegates. I am writing on behalf of our state based membership organization.

Thank you for your time and efforts in interpreting our licensing law and promulgating the rules and regulations. We are grateful to be licensed and are ready to get to work.

I have a few comments about one section of the proposed rules and regulations:

In Section 3

Under Section 3.03 (2) (b) – Requiring an applicant to have completed NPLEX exams in order to qualify for a MA license could create potential problems. For one point, there are several naturopathic doctors who finished their training before the NPLEX exam was offered in 1987. These individuals took the equivalent exam that their state offered. These potential applicants should be considered for MA licensure as they passed an exam which is *equivalent* to the NPLEX exam. Another reason I disagree with using NPLEX as a qualifier for licensure is the NPLEX exam itself may be discontinued, meaning, a state or province may no longer offer the exam, but will offer an equivalent. It would be unfortunate if a graduating naturopathic doctor, who wanted to practice in Massachusetts were turned away because they had taken, and passed, an exam that was the equivalent to the NPLEX but not the NPLEX. If an applicant passed a national board examination, such as NPLEX, or its equivalent, which could be a state or provincial exam, the applicant should be considered for licensure.

Thank you again for all your time and work to create an excellent set of regulations for this new profession in the state. Our state association looks forward to working with you in the coming years to insure that all applicants and licensees practice in accordance with the rules and regulations.

With respect,

Allison Willette RN ND