

WSR 25-02-094

PROPOSED RULES

DEPARTMENT OF HEALTH

(Board of Naturopathy)

[Filed December 30, 2024, 11:53 a.m.]

Original Notice.

Preproposal statement of inquiry was filed as WSR 24-10-050.

Title of Rule and Other Identifying Information: Naturopathic license requirements in WAC 246-836-020 Requirements for licensure, and 246-836-040 Jurisprudence examinations. The board of naturopathy (board) is proposing amendments to licensure requirements relating to jurisprudence (JP) examinations as a condition for licensure for naturopathic physicians and to clarify, update, and simplify rules to comply with RCW 18.130.077.

Hearing Location(s): On February 7, 2025, at 9:00 a.m., at 111 Israel Road S.E., Tumwater, WA 98501; or virtual. Register in advance for this webinar [https://us02web.zoom.us/webinar/register/WN\\_KgsCCEdJRvGxjv6Yl5rOCg](https://us02web.zoom.us/webinar/register/WN_KgsCCEdJRvGxjv6Yl5rOCg). After registering, you will receive a confirmation email containing information about joining the webinar. The public hearing will be hybrid. Participants can attend in person at the physical location or virtually by registering via Zoom.

Date of Intended Adoption: February 7, 2025.

Submit Written Comments to: Rachel Phipps, P.O. Box 47852, Olympia, WA 98504-7852, email [naturopathy@doh.wa.gov](mailto:naturopathy@doh.wa.gov), fax 360-236-2901, <https://fortress.wa.gov/doh/policyreview/>, beginning on the date and time of this filing, by January 31, 2025, at 11:59 p.m.

Assistance for Persons with Disabilities: Contact Rachel Phipps, phone 564-233-1277, fax 360-236-2901, TTY 711, email [naturopathy@doh.wa.gov](mailto:naturopathy@doh.wa.gov), by January 30, 2025.

Purpose of the Proposal and Its Anticipated Effects, Including Any Changes in Existing Rules: The board is proposing changes to WAC 246-836-020 Requirements for licensure, to remove the JP examination as a requirement for initial licensure to reduce barriers for naturopathic physicians entering the Washington workforce.

The board is also proposing amendments to WAC 246-836-040 Jurisprudence examinations, to require that a licensed naturopathic physician shall take and pass the board-approved JP exam within the first full continuing education cycle. The proposed amendments also clarify which category the JP exam will qualify for under the continuing competency program requirements in WAC 246-836-080, and that successful completion is 100 percent.

Reasons Supporting Proposal: 2SHB 1724 (section 8, chapter 425, Laws 2023), codified as RCW 18.130.077, directs the board to reduce barriers to obtaining licensure in Washington. The bill requires disciplining authorities to waive education, training, experience, and exam requirements for applicants who have been credentialed in another state or states with substantially equivalent standards for at least two years immediately preceding their application with no interruption in licensure lasting longer than 90 days.

Pursuant to RCW 18.130.077 and 18.36A.150, the requirement to waive education, training, experience, and exam requirements for out-of-state applicants applies to naturopathic physicians. Reducing barriers for licensure of naturopathic physicians for out-of-state professionals will increase access to health care for Washingtonians, achieving the goal of RCW 18.130.077.

The proposed amendments comply with RCW 18.130.077 by removing the JP exam as a requirement for an initial license and is intended to reduce barriers for out-of-state applicants. Additionally, the board is proposing amendments that will make the JP exam a requirement to maintain licensure. Because the JP exam is Washington state specific, the board believes it's important that all licensed naturopathic physicians are knowledgeable of the rules and regulations related to their scope of practice to ensure that they serve patients with the highest quality of care.

Statutory Authority for Adoption: RCW 18.36A.150 and 18.130.077.  
Statute Being Implemented: RCW 18.130.077.

Rule is not necessitated by federal law, federal or state court decision.

Name of Proponent: Board of naturopathy, governmental.

Name of Agency Personnel Responsible for Drafting: Rachel Phipps, 111 Israel Road S.W., Tumwater, WA 98501, 564-233-1277; Implementation and Enforcement: James Chaney, 111 Israel Road S.W., Tumwater, WA 98501, 360-236-2831.

A school district fiscal impact statement is not required under RCW 28A.305.135.

A cost-benefit analysis is required under RCW 34.05.328. A preliminary cost-benefit analysis may be obtained by contacting Rachel Phipps, P.O. Box 47852, Olympia, WA 98504-7852, phone 564-233-1277, fax 360-236-2901, TTY 711, email naturopathic@doh.wa.gov.

This rule proposal, or portions of the proposal, is exempt from requirements of the Regulatory Fairness Act because the proposal:

Is exempt under RCW 19.85.025(4).

Explanation of exemptions: The proposed rule only impacts the licensing of providers and does not impact small businesses.

Scope of exemption for rule proposal:

Is fully exempt.

December 26, 2024  
U. James Chaney  
Executive Director  
Board of Naturopathy

### OTS-5929.3

AMENDATORY SECTION (Amending WSR 15-10-028, filed 4/27/15, effective 5/28/15)

**WAC 246-836-020 Requirements for licensure.** Individuals seeking a license to practice as a naturopathic physician (~~(must)~~) shall provide the following:

- (1) A completed application, with all required fees;
- (2) Official transcripts sent directly from a college of naturopathic medicine approved by the board, demonstrating that the applicant has graduated as a naturopathic physician;
- (3) Verification of successful passage of the national examination approved by the board under WAC 246-836-030 sent directly from the examination entity;

- (4) ~~((Successful passage of the jurisprudence examination provided by the board;~~  
~~(5))~~) A federal background check application, if required, including fingerprint cards and fee per RCW 18.130.064 (2) (b); and  
~~((6))~~ (5) Any other documentation, materials, or information as determined by the board or its designee.

AMENDATORY SECTION (Amending WSR 15-10-028, filed 4/27/15, effective 5/28/15)

**WAC 246-836-040 Jurisprudence examinations.** (1) ~~((Individuals taking the jurisprudence examination provided by the board must pay the appropriate fee when submitting it for scoring.~~

~~(2) The minimum passing score for the jurisprudence examination is seventy-five.~~

~~(3) Individuals who fail the jurisprudence examination may retake the examination provided they submit an additional fee.~~

~~(4) An individual's jurisprudence examination score is released only to the individual unless a written request is submitted that authorizes release to a specific third party.)~~ A licensed naturopath shall take and pass the board approved jurisprudence examination within the first full continuing education reporting period after initial licensure.

(2) The jurisprudence exam will be available as a category 3 continuing education credit as outlined in WAC 246-836-080.

(3) The passing score for the jurisprudence examination is 100 percent.