



The Board of Naturopathy recently received inquiries about what services or procedures a naturopathic physician can and cannot perform. In addition, we have had inquiries about what services for which a naturopathic physician can and cannot advertise. The answers to these questions can be difficult even for those who think they know health profession laws and rules. At the board's direction, this notice was prepared to help naturopathic physicians navigate these tricky waters.

Terms that you cannot use are those that are protected in another health profession's practice act; for example, the term "massage therapist" is protected under [RCW 18.108.030](#)(1) so you must hold a massage therapist license in order to refer to yourself as such. Additional protected terms in that statute include, but are not limited to, "massage practitioner", "massagist", "masseur", "touch therapist", and "massage technician".

You can, however, advertise and provide any service that is specifically listed in your scope of practice; for example, the term "physical modalities" is listed in the scope of practice statute for naturopathic physicians ([RCW 18.36A.040](#)). That term is defined in [RCW 18.36A.020](#)(12) as including "massage". So you can advertise and provide massage service.

Another example is "counseling". There are a number of regulated health professions in the mental health area, such as "mental health counselor", "certified counselor", or "agency affiliated counselor" to name a few. Providing counseling services is in the scope of naturopathic practice. In [RCW 18.36A.040](#) it's referred to as "suggestion", which is defined in [RCW 18.36A.020](#)(15) as meaning "techniques including but not limited to counseling, biofeedback, and hypnosis."

An interesting thing to note is that the scope of naturopathic practice law ([RCW 18.36A.040](#)) states, 'No person licensed under this chapter may employ the term "chiropractic" to describe any services provided by a naturopath under this chapter.' In some form or another, this same exclusion language can be found in almost every health professions' practice act.

So in summary, if you have a question about what you're able to do or what you can include in any advertising, look first to your own practice act ([chapter 18.36A RCW](#)). If it's listed there, you're safe. If not, check other similar professions' practice acts; they can be found among the professions listed under [Title 18](#) of the Revised Code of Washington (RCW).