

The Florida Senate
BILL ANALYSIS AND FISCAL IMPACT STATEMENT

(This document is based on the provisions contained in the legislation as of the latest date listed below.)

Prepared By: The Professional Staff of the Committee on Health Policy

BILL: SB 688

INTRODUCER: Senator Rodriguez

SUBJECT: Naturopathic Medicine

DATE: February 10, 2026 REVISED: _____

ANALYST	STAFF DIRECTOR	REFERENCE	ACTION
1. Smith	Brown	HP	Pre-meeting
2.		AHS	
3.		FP	

I. Summary:

SB 688 reestablishes the licensure and regulation of naturopathic doctors in Florida by redesignating ch. 462, F.S., as “Naturopathic Medicine” and by updating the chapter’s regulatory framework.

The bill creates the Board of Naturopathic Medicine to assist the Department of Health (DOH) with the regulation of naturopathic doctors. The bill establishes licensure by examination for applicants who hold a doctoral degree in naturopathic medicine, provides for licensure by endorsement through the MOBILE Act, sets biennial renewal and continuing education requirements, and applies standard disciplinary authority. The bill also prohibits unlicensed practice and protected-title misuse, while providing specified exceptions.

The bill defines the scope of naturopathic practice to include specified diagnostic and natural treatment modalities but expressly excludes prescriptive authority for legend drugs or prescription drugs, except as expressly provided for certain natural, nonpharmacologic substances.

The bill provides an effective date of December 31, 2026.

II. Present Situation:

Naturopathy

The term “naturopathy” was used in the late nineteenth century to refer to an emerging system of natural therapies and philosophy to treat disease. Naturopathic physicians diagnose, treat, and care for patients using a system of practice that bases treatment on natural laws governing the human body. These practitioners may provide treatment to patients using psychological, mechanical, and other means to purify, cleanse, and normalize human tissues for the preservation

and restoration of health. This may include the use of air, water, light, heat, earth, food and herb therapy, psychotherapy, electrotherapy, physiotherapy, minor surgery, and naturopathic manipulation. Naturopathic physicians are trained in standard medical sciences and in the use and interpretation of standard diagnostic instruments. Naturopathic medicine stresses a holistic approach to health care, which involves studying and working with the patient mentally and spiritually, as well as physically, and developing an understanding of the patient in the patient's chosen environment.

Florida Licensure and Regulation of Naturopathy

Naturopathy was initially recognized by the Legislature in the Medical Act of 1921,¹ which defined the practice of medicine and exempted naturopaths from the medical practice act. Naturopathic practitioners were first licensed in Florida in 1927.² Doctors of Naturopathy were required to observe state, county, and municipal regulations regarding the control of communicable diseases, the reporting of births and deaths, and all matters relating to the public health as was required of other "practitioners of the healing arts."

Between 1947 and 1954, legal cases were decided regarding the rights of naturopaths to prescribe narcotic drugs. The Circuit Court in Pinellas County held that practitioners of naturopathy had the right to prescribe narcotic drugs.³ On appeal, the Florida Supreme Court affirmed the lower court's decision.⁴

In 1957, the Legislature abolished the Board of Naturopathic Examiners, significantly revised the regulation of naturopathy, and placed the regulation under the Florida State Board of Health.⁵ Naturopaths were classified into three groups based on the length of time that the practitioner was licensed in the state. Under that law, those licensed less than two years could not renew their licenses; those licensed more than two years but less than 15 years could not prescribe medicine in any form; and those licensed more than 15 years could not prescribe narcotic drugs. The Florida Supreme Court held that the naturopathic laws, as amended by ch. 57-129, L.O.F., were unconstitutional and void.⁶

In 1959, the Legislature abolished the licensing authority for naturopathy.⁷ Only those naturopathic practitioners licensed at that time who had been residents of Florida for two years prior to enactment of ch. 59-164, L.O.F., were authorized to renew their licenses.

¹ Chapter 8415, Laws of Fla.

² Chapter 12286, Laws of Fla.

³ *In re: Complaint of Melser*, 32 So.2d 742 (Fla.1947). See also *State Department of Public Works v. Melser*, 69 So.2d 347 at 353 (Fla. 1954).

⁴ *Id.* See also Attorney General Opinion 54-96 and s. 893.02(19), F.S., relating to controlled substances, which defines "practitioner" to include "... a naturopath licensed pursuant to chapter 462, F.S." In 1939, the 5th Circuit Fed. Ct. (which includes Louisiana, Mississippi, and Texas) interpreted the Federal Narcotic Drug Act which determined that a "naturopath" was not a "physician;" therefore, they were prohibited from prescribing narcotic drugs. The court determined that even under phytotherapy, they could not prescribe drugs. *Perry v. Larson*, 104 F.2d 728 (1939).

⁵ Chapter 57-129, Laws of Fla.

⁶ See *Eslin v. Collins*, 69 So.2d 347 (Fla. 1959).

⁷ Chapter 59-164, Laws of Fla.

Currently, ch. 462, F.S., governs the practice of naturopathy within the DOH. The current practice act includes a wide variety of healing techniques but prohibits surgery, chiropractic medicine, and the practice of “materia medica,” a term that includes the prescription of drugs.⁸ Chapter 462, F.S., prohibits the issuance of a license to any person who was not practicing naturopathy in Florida as of July 1, 1959.⁹ The chapter also authorizes the DOH to adopt rules to implement the regulation of naturopathic medicine including the establishment of fees.¹⁰ Additionally, it provides procedures for naturopathic physicians licensed prior to 1959 to renew their license.¹¹

At this time, there are zero naturopathic physicians licensed in Florida.¹²

Other State Licensure of Naturopathy¹³

The following 26 states or territories offer licensure or registration to naturopaths: Alaska, Arizona, California, Colorado, Connecticut, District of Columbia, Hawaii, Idaho, Kansas, Maine, Maryland, Massachusetts, Minnesota, Montana, New Hampshire, New Mexico, North Dakota, Oregon, Pennsylvania, Rhode Island, Utah, Vermont, Washington, Wisconsin, Puerto Rico, and the U.S. Virgin Islands.

Education Accreditation and Requirements

Naturopathic medical schools are accredited through the Council on Naturopathic Medical Education (CNME). The CNME is the only naturopathic education accrediting agency recognized by the U.S. Department of Education (USDOE). There are currently six accredited programs, with eight campuses in Arizona, California, Illinois, Oregon, Washington, Puerto Rico and Canada.

Before enrolling in an accredited naturopathic medical school, students must:

- Successfully complete standard pre-medical college courses including physics, math, several courses of chemistry and biology as well as the humanities and psychology;
- Graduate from an accredited baccalaureate program; and
- Apply to and be accepted into one of the CNME accredited Doctor of Naturopathic Medicine Programs.

⁸ Section 462.01(1), F.S., “Natureopathy” and “Naturopathy” shall be construed as synonymous terms and mean the use and practice of psychological, mechanical, and material health sciences to aid in purifying, cleansing, and normalizing human tissues for the preservation or restoration of health, according to the fundamental principles of anatomy, physiology, and applied psychology, as may be required. Naturopathic practice employs, among other agencies, phytotherapy, dietetics, psychotherapy, suggestotherapy, hydrotherapy, zone therapy, biochemistry, external applications, electrotherapy, mechanotherapy, mechanical and electrical appliances, hygiene, first aid, sanitation, and heliotherapy; provided, however, that nothing in this chapter shall be held or construed to authorize any naturopathic physician licensed hereunder to practice materia medica or surgery or chiropractic medicine, nor shall the provisions of this law in any manner apply to or affect the practice of osteopathic medicine, chiropractic medicine, Christian Science, or any other treatment authorized and provided for by law for the cure or prevention of disease and ailments.

⁹ Section 462.023, F.S.

¹⁰ *Id.*

¹¹ Section 462.16, F.S.

¹² Department of Health, 2024 House Bill 843 Legislative Bill Analysis (Dec. 19, 2023) (on file with the Senate Committee on Health Policy).

¹³ *Id.*

Naturopathic medical school is a four-year doctoral program that provides students with advanced study in clinical sciences and naturopathic therapeutic treatment modalities.

Examination

The North American Board of Naturopathic Examiners (NABNE) is recognized as the examining body for the Naturopathic Physicians Licensing Examination (NPLEX). NPLEX is the examination that graduates of one of the approved naturopathic medical colleges must pass before being eligible for licensure in any of the 26 United States jurisdictions and five Canadian provinces that license or register naturopaths.

The purpose of NABNE is to determine the eligibility of applicants to take the NPLEX, to administer the NPLEX to examinees, and to send exam results and transcripts to regulatory authorities. The institutions that regulate naturopathic medicine grant authority to NABNE to be the examining body for the naturopathic medical profession through their agreement to use the results of the NPLEX in their determination of a candidate's eligibility for licensure.

The NPLEX is an independent, nonprofit organization whose purpose is to prepare valid and reliable biomedical science examinations (Part I) that assess the readiness of students to enter the clinical phase of training, and clinical science examinations (Part II) that assess the entry-level competence of candidates who plan to become licensed naturopaths.

III. Effect of Proposed Changes:

Section 1 of the bill redesignates ch. 462, F.S., from "Naturopathy" to "Naturopathic Medicine."

Section 2 of the bill creates s. 462.001, F.S., to provide legislative findings and purpose, including legislative intent to modernize regulation related to naturopathy in Florida by ensuring that naturopathic medicine is practiced by licensed naturopathic doctors who meet specified education and training standards and are held accountable for safe practice. The current ch. 462, F.S., regulates naturopathic *physicians*. The bill provides for the licensure and regulation of naturopathic *doctors*.

Section 3 of the bill creates s. 462.002, F.S., to provide exceptions, specifying that ch. 462, F.S., does not apply to other duly licensed health care practitioners acting within their respective scopes of practice; certain students and residents practicing under direct supervision in specified accredited or recognized programs; certain out-of-jurisdiction naturopathic doctors performing procedures or demonstrations for educational purposes at board-approved continuing education programs; the practice of the religious tenets of any church; and the domestic administration of recognized family remedies.

The section also provides that ch. 462, F.S., does not prohibit certain persons from employing specified natural therapies in their occupations or from using certain descriptive terms, provided that the person does not use a protected title and does not misrepresent himself or herself as a person licensed under the chapter.

Section 4 of the bill renumbers and amends s. 462.01, F.S., as s. 462.003, F.S., to revise and provide definitions. The section defines “naturopathic doctor” as a person who is licensed to practice naturopathic medicine under ch. 462, F.S., and revises the definition of “naturopathic medicine” and “practice of naturopathic medicine” to include specified diagnostic, preventive, and treatment modalities, and to exclude specified activities and practices.

The bill defines “naturopathic medicine” and “the practice of naturopathic medicine” as the diagnosis, prevention, and treatment of physical or mental conditions by a licensed naturopathic doctor using modalities such as botanical and fungal extracts, clinical nutrition, counseling, dietary supplements, environmental medicine, homeopathy, imaging, lab testing, lifestyle medicine, natural substances, physical exams, and physical medicine, when consistent with CNME-accredited doctoral education and consistent with naturopathic principles and the naturopathic therapeutic order.

The bill expressly excludes from the scope of naturopathic medicine:

- Prescribing, dispensing, or administering legend drugs or prescription drugs, except as expressly authorized for certain natural, nonpharmacologic substances (e.g., vitamin B12);
- Surgery;
- Holding out as, or practicing as, any other licensed profession (e.g., an allopathic or osteopathic physician, dentist, nurse practitioner, physician assistant, chiropractor, physical therapist, acupuncturist, or midwife);
- The use of general anesthesia or spinal anesthesia;
- Administering ionizing radioactive substances;
- High-velocity spinal or joint manipulation, unless the naturopathic doctor is also licensed as a chiropractor or an osteopathic physician;
- Acupuncture, unless the naturopathic doctor is also licensed as an acupuncturist; and
- Labor and delivery management, unless the naturopathic doctor is also licensed as a midwife.

Section 5 of the bill creates s. 462.004, F.S., to create the Board of Naturopathic Medicine (Board) within the DOH. The section provides for board membership, appointment, and confirmation requirements, and provides that applicable provisions of ch. 456, F.S., relating to practitioner regulatory boards will apply to the Board. The Board is to be composed of seven members, including four naturopathic doctors, two physicians licensed under ch. 458 or 459, F.S., and one non-physician public member.

Section 6 of the bill renumbers and amends s. 462.023, F.S., as s. 462.005, F.S., to authorize the Board to adopt rules to implement ch. 462, F.S., as amended by this bill.

This section of the bill also eliminates the DOH’s existing authority to establish and collect initial licensing fees from naturopathic physicians.

Section 7 of the bill creates s. 462.006, F.S., to prohibit unlicensed persons from practicing naturopathic medicine or from promoting, identifying, or describing themselves as a “doctor of naturopathic medicine” or a “naturopathic doctor” or use the corresponding abbreviations “N.D.” or “N.M.D.” A violation of this section would constitute a misdemeanor and be punishable as provided in s. 775.082 or s. 775.083, F.S.

This section works in conjunction with the exceptions created in the bill's new s. 462.002, F.S., as the enumerated exempt individuals would not be engaging in unlicensed practice.

Section 8 of the bill creates s. 462.007, F.S., to provide for licensure by examination of naturopathic doctors. To become licensed by examination, a person must apply on a form furnished by the DOH and the Board must certify that the applicant meets the following criteria:

- Is at least 21 years old.
- Holds a bachelor's degree from a:
 - U.S. accredited college/university (recognized by USDOE or CHEA), or
 - Canadian university that is a Universities Canada member, or
 - Foreign institution with board-approved credential evaluation showing equivalency (via a nationally recognized credential-evaluating agency; transcripts/syllabi/diplomas required).
- Holds a naturopathic doctoral degree from a program accredited by the Council on Naturopathic Medical Education (CNME).
- Is physically and mentally fit to practice.
- Is of good moral character.
- Submits fingerprints and pays costs for a criminal background check.
- Obtains a passing score on Part I - Biomedical Science Examination, Part II - Core Clinical Science Examination, and Part II - Clinical Elective Pharmacology Examination of the competency-based national Naturopathic Physician Licensing Examination administered by the North American Board of Naturopathic Examiners.

The bill requires the DOH and the Board to use an investigative process to ensure that applicants meet the applicable criteria, authorizes the State Surgeon General or his or her designee to issue a 90-day licensure delay under certain circumstances, provides construction, prohibits the Board from certifying certain applicants for licensure until completion of an investigation in another jurisdiction, and authorizes the Board to deny certification or certify with restrictions or for a probationary period if it determines that an applicant does not meet all licensure requirements.

Section 9 of the bill creates s. 462.008, F.S., to provide for licensure by endorsement of naturopathic doctors through the Mobile Opportunity by Interstate Licensure Endorsement (MOBILE) Act in s. 456.0145, F.S.

Section 10 of the bill renames and amends s. 462.08, F.S., as s. 462.009, F.S., to update requirements for licensure renewal for naturopathic doctors. The bill requires the DOH to adopt rules establishing procedures for the biennial renewal of licenses under this chapter.

This section retains the existing language providing for a biennial licensure renewal fee, as determined by the DOH, but which may not exceed \$1,000.

Section 11 of the bill renames and amends s. 462.18, F.S., to revise continuing education requirements for naturopathic doctors. Under the bill, the Board must require at least 60 hours of continuing education during each biennial renewal period. The bill requires the Board to approve organizations that accredit naturopathic continuing education providers, including the American

Association of Naturopathic Physicians and the North American Naturopathic Continuing Education Accreditation Council.

The bill requires naturopathic doctors to use the DOH's electronic continuing education tracking system to demonstrate compliance with continuing education requirements. The DOH notes that it would be required to work with the contracted continuing education vendor to establish this profession within the tracking system.¹⁴

Section 12 of the bill renumbers and amends s. 462.19, F.S., to revise provisions related to reactivation of inactive naturopathic doctor licenses and requires the Board to adopt rules.

Section 13 of the bill renumbers and amends s. 462.14, F.S., to revise grounds for disciplinary action. A naturopathic doctor would also be subject to grounds for discipline in s. 456.072, F.S.

Section 14 of the bill repeals s. 462.17, F.S., relating to the penalty for offenses relating to naturopathy.

Section 15 of the bill amends s. 20.43, F.S., to conform to changes made by the bill, including the Board within the DOH's Division of Medical Quality Assurance.

Section 16 of the bill amends s. 381.0031, F.S., to conform an existing provision that requires a practitioner licensed to practice naturopathy to report diseases of public health significance to the DOH, to changes made by the bill.

Section 17 of the bill amends s. 468.301, F.S., relating to radiological personnel certification, to conform to changes made by the bill.

Section 18 of the bill amends s. 476.044, F.S., exempting naturopathic physicians from barbering regulation, to conform to changes made by the bill.

Section 19 of the bill amends s. 477.0135, F.S., exempting naturopathic physicians from cosmetology regulation, to conform to changes made by the bill.

Section 20 of the bill amends s. 485.003, F.S., regarding hypnosis, to conform to changes made by the bill.

Section 21 of the bill amends s. 486.161, F.S., providing construction relating to the practice of physical therapy, to conform to changes made by the act.

Section 22 of the bill amends s. 627.351, F.S., relating to medical-malpractice shared-risk plans, to conform to changes made by the bill.

Section 23 of the bill amends s. 893.02, F.S., relating to drug abuse prevention and control, to replace a reference to a "naturopath" with "naturopathic doctor." *See Section VI. of this analysis, "Technical Deficiencies."*

¹⁴ *Id.*

Section 24 of the bill amends s. 921.0022, F.S., to update the Criminal Punishment Code and conform to changes made by the bill. This section deletes “practicing naturopathy without a license” from the Criminal Punishment Code, as it is a misdemeanor and no longer a felony under the bill.

Section 25 of the bill provides an effective date of December 31, 2026.

IV. Constitutional Issues:

A. Municipality/County Mandates Restrictions:

None.

B. Public Records/Open Meetings Issues:

None.

C. Trust Funds Restrictions:

None.

D. State Tax or Fee Increases:

None.

E. Other Constitutional Issues:

None.

V. Fiscal Impact Statement:

A. Tax/Fee Issues:

Section 6 of the bill, which renumbers and amends s. 462.023, F.S., as s. 462.005, F.S., eliminates the DOH’s existing authority to establish and collect initial licensing fees from naturopathic physicians. The bill does not provide for the submission or collection of initial licensure fees.

Section 10 of the bill which renumbers and amends s. 462.08, F.S., as s. 462.009, F.S., retains the DOH’s existing authority to establish and collect a biennial licensure renewal fee not to exceed \$1,000.

B. Private Sector Impact:

None.

C. Government Sector Impact:

The DOH and its Division of Medical Quality Assurance might experience a recurring increase in workload associated with processing applications for licensure, establishing the Board, and regulating naturopathic doctors. Because it is unclear how many applicants will seek initial licensure, the fiscal impact is indeterminate.

VI. Technical Deficiencies:

Section 23 of the bill amends s. 893.02, F.S., to update the title of a naturopathic doctor in accordance with changes made in the bill. However, because the bill does not include prescriptive authority in the scope of practice of naturopathic medicine, the reference to “a naturopath licensed under chapter 462” should be stricken and deleted rather than revised because the naturopathic doctor will not be authorized to prescribe controlled substances under the bill.

VII. Related Issues:

Section 5 of the bill creates s. 462.004, F.S., to require the appointment of four members of the Board who are “licensed naturopathic doctors who are residents of this state.” The bill defines the term “naturopathic doctor” as a doctor licensed under ch. 462, F.S. It is unclear how initial appointments to the board can be made given that no individuals currently meet the criteria of being licensed naturopathic doctors.

The DOH has previously commented that it does not use a formal “investigative process” related to licensure applications and that MQA is not trained or staffed to conduct such investigations. The DOH notes that its current review process is efficient and effective in ensuring that applicants meet licensure requirements and do not pose a risk to health and safety of the public. If it is unintended for the DOH to establish an entirely new process for the licensure of naturopathic doctors, the bill should be amended to align with the licensure processes of other practitioners.

VIII. Statutes Affected:

This bill substantially amends the following sections of the Florida Statutes: 20.43, 381.0031, 462.01, 462.003, 462.005, 462.08, 462.009, 462.18, 462.011, 462.19, 462.012, 462.14, 462.017, 462.023, 468.301, 476.044, 477.0135, 485.003, 486.161, 627.351, 893.02, 921.0022.

This bill creates the following sections of the Florida Statutes: 462.001, 462.002, 462.004, 462.006, 462.007, and 462.008.

This bill repeals section 462.17 of the Florida Statutes.

IX. Additional Information:

A. Committee Substitute – Statement of Changes:

(Summarizing differences between the Committee Substitute and the prior version of the bill.)

None.

B. Amendments:

None.

This Senate Bill Analysis does not reflect the intent or official position of the bill's introducer or the Florida Senate.
