

**STATE OF WISCONSIN  
NATUROPATHIC MEDICINE EXAMINING BOARD**

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**IN THE MATTER OF RULEMAKING :  
PROCEEDINGS BEFORE THE : REPORT TO THE LEGISLATURE  
NATUROPATHIC MEDICINE : CR 25-081  
EXAMINING BOARD :  
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**I. THE PROPOSED RULE:**

The proposed rule, including the analysis and text, is attached.

**II. REFERENCE TO APPLICABLE FORMS: N/A**

**III. FISCAL ESTIMATE AND EIA:**

The Fiscal Estimate and EIA is attached.

**IV. DETAILED STATEMENT EXPLAINING THE BASIS AND PURPOSE OF THE PROPOSED RULE, INCLUDING HOW THE PROPOSED RULE ADVANCES RELEVANT STATUTORY GOALS OR PURPOSES:**

The Naturopathic Medicine Examining Board reviewed chapters Nat Med 1, 2, and 6, to provide clarity regarding the scope of practice of naturopathic doctors and limited-scope naturopathic doctors because the current rules concerning scope of practice are unclear about the boundaries of these practitioners' activities in their practice, such as the limitations of intravenous vitamin treatments. The review prompted the following changes:

1. Creation of a definition of "routes of administration" in Nat Med 1.02.
2. Addition of a provision in Nat Med 2.03 that specifies which routes of administration a naturopathic doctor may utilize provided it is consistent with the naturopathic doctor's education and training.
3. Creation of a list in Nat Med 6.01 explaining limited-scope naturopathic doctors' scope of practice, which includes a provision that specifies which routes of administration a limited-scope naturopathic doctor may utilize provided it is consistent with the limited-scope naturopathic doctor's education and training. This list also includes a provision about the limitations a limited-scope naturopathic doctor has regarding nonprescription drug products.

**V. SUMMARY OF PUBLIC COMMENTS AND THE BOARD'S RESPONSES, EXPLANATION OF MODIFICATIONS TO PROPOSED RULES PROMPTED BY PUBLIC COMMENTS:**

The Naturopathic Medicine Examining Board held a public hearing on December 12, 2025. No comments were received.

**VI. RESPONSE TO LEGISLATIVE COUNCIL STAFF RECOMMENDATIONS:**

All of the recommendations suggested in the Clearinghouse Report have been accepted in whole.

**VII. REPORT FROM THE SBRRB AND FINAL REGULATORY FLEXIBILITY ANALYSIS:**

N/A

STATE OF WISCONSIN  
NATUROPATHIC MEDICINE EXAMINING BOARD

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IN THE MATTER OF RULEMAKING	:	PROPOSED ORDER OF THE
PROCEEDINGS BEFORE THE	:	NATUROPATHIC MEDICINE
NATUROPATHIC MEDICINE	:	EXAMINING BOARD
EXAMINING BOARD	:	ADOPTING RULES
	:	(CLEARINGHOUSE RULE 25-081)

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PROPOSED ORDER

An order of the Naturopathic Medicine Examining Board **to renumber** Nat Med 2.03 (1); **to renumber and amend** Nat Med 6.01 (1); **to amend** Nat Med 6.01 (2); and **to create** Nat Med 1.02 (1m), 2.03 (2), 6.01 (1) (a) and (b) and (c) and (d), and (3), relating to scope of practice.

Analysis prepared by the Department of Safety and Professional Services.

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ANALYSIS

**Statutes interpreted:**

Sections 466.03 and 446.05, Stats.

**Statutory authority:**

Sections 15.08 (5) (b), 227.11 (2) (a), 466.03 (1) (a), (2) (a), and (2) (am), Stats.

**Explanation of agency authority:**

Section 15.08 (5) (b), Stats., states that each examining board “[s]hall promulgate rules for its own guidance and for the guidance of the trade or profession to which it pertains and define and enforce professional conduct and unethical practices not inconsistent with the law relating to the particular trade or profession.”

Section 227.11 (2) (a), Stats., states that “[e]ach agency may promulgate rules interpreting the provisions of any statute enforced or administered by the agency, if the agency considers it necessary to effectuate the purpose of the statute...”

Section 466.03 (1) (a), Stats., states that the Naturopathic Medicine Examining Board shall promulgate rules to establish “[s]tandards of practice for and a code of ethics governing the professional conduct of naturopathic doctors and limited-scope naturopathic doctors.”

Section 466.03 (2) (a) states that the board may promulgate rules to “[f]urther interpret s. 466.01 (6) (a) and (c), including to identify diagnostic, therapeutic, or other practices or procedures that may be used by naturopathic doctors. The board may not authorize a

naturopathic doctor to engage in any practice excluded from the definition of naturopathic medicine under s. 466.01 (6) (c) or otherwise expand the scope of practice of a naturopathic doctor or limited-scope naturopathic doctor beyond what is specified under s. 466.01 (6) (a).”

Section 466.03 (2) (am) states that the board may promulgate rules to “[e]xpressly prohibit diagnostic, therapeutic, or other practices.”

**Related statute or rule:**

None.

**Plain language analysis:**

The Naturopathic Medicine Examining Board reviewed chapters Nat Med 1, 2, and 6, to provide clarity regarding the scope of practice of naturopathic doctors and limited-scope naturopathic doctors because the current rules concerning scope of practice are unclear about the boundaries of these practitioners’ activities in their practice, such as the limitations of intravenous vitamin treatments. The review prompted the following changes:

1. Creation of a definition of “routes of administration” in Nat Med 1.02.
2. Addition of a provision in Nat Med 2.03 that specifies which routes of administration a naturopathic doctor may utilize provided it is consistent with the naturopathic doctor’s education and training.
3. Creation of a list in Nat Med 6.01 explaining limited-scope naturopathic doctors’ scope of practice, which includes a provision that specifies which routes of administration a limited-scope naturopathic doctor may utilize provided it is consistent with the limited-scope naturopathic doctor’s education and training. This list also includes a provision about the limitations a limited-scope naturopathic doctor has regarding nonprescription drug products.

**Summary of, and comparison with, existing or proposed federal regulation:**

N/A.

**Summary of public comments received on statement of scope and a description of how and to what extent those comments and feedback were taken into account in drafting the proposed rule:**

N/A

**Comparison with rules in adjacent states:**

**Illinois**

Illinois does not currently license naturopathic doctors.

### **Iowa**

Iowa does not currently license naturopathic doctors.

### **Michigan**

Michigan does not currently license naturopathic doctors.

### **Minnesota**

Minnesota authorizes registered naturopathic doctors to perform physical and laboratory examinations for diagnostic purposes and permits the administration, prescription, and dispensing of a range of substances, including foods, vitamins, botanical medicines, homeopathic medicines, and nonprescription drugs. Minnesota also allows the use of naturopathic physical medicine, encompassing modalities like hydrotherapy, massage, and the therapeutic application of heat, cold, and non-ionizing radiation. Minnesota prohibits naturopathic doctors from prescribing or administering legend drugs or controlled substances, performing major surgical procedures, or using interventions such as general or spinal anesthesia. [Section 147E.05 MN Statutes]

Minnesota does not have an equivalent to the limited-scope naturopathic doctor license in Wisconsin.

### **Summary of factual data and analytical methodologies:**

The proposed rules were developed by reviewing chapters Nat Med 1, 2, and 6 in conjunction with chapter 466 of the Statutes to ensure that the code is compliant with statutory changes and with current standards of practice. No additional factual data or analytical methodologies were used to develop the proposed rules.

### **Analysis and supporting documents used to determine effect on small business or in preparation of economic impact analysis:**

The proposed rule was posted for a period of 14 days to solicit public comments on economic impact, including how the proposed rules may affect businesses, local government units, and individuals. No comments were received.

### **Fiscal Estimate and Economic Impact Analysis:**

The Fiscal Estimate and Economic Impact Analysis is attached.

### **Effect on small business:**

These proposed rules do not have an economic impact on small businesses, as defined in s. 227.114 (1), Stats. The Department's Regulatory Review Coordinator may be contacted by email at [Jennifer.Garrett@wisconsin.gov](mailto:Jennifer.Garrett@wisconsin.gov), or by calling (608) 266-2112.

**Agency contact person:**

Sofia Anderson, Administrative Rules Coordinator, Department of Safety and Professional Services, Office of Chief Legal Counsel, P.O. Box 14497, Madison, Wisconsin 53708-0497; email at [DSPSAdminRules@wisconsin.gov](mailto:DSPSAdminRules@wisconsin.gov).

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TEXT OF RULE

SECTION 1. Nat Med 1.02 (11m) is created to read:

**Nat Med 1.02 (11m)** "Route of administration" means the path by which a substance is introduced into the body for a therapeutic effect. The term includes routes such as oral, nasal, auricular, ocular, rectal, vaginal, transdermal, intramuscular, intravenous, intradermal, and subcutaneous.

SECTION 2. Nat Med 2.03 is renumbered Nat Med 2.03 (1).

SECTION 3. Nat Med 2.03 (2) is created to read:

**Nat Med 2.03 (2)** Consistent with sub. (1) and s. 466.05 (1) (b), Stats., a naturopathic doctor may utilize routes of administration that include oral, nasal, auricular, ocular, rectal, vaginal, transdermal, intramuscular, intravenous, intradermal, and subcutaneous, provided such utilization is consistent with the naturopathic doctor's education and training. The specific route used shall be consistent with the properties of the substance and the desired clinical effect.

SECTION 4. Nat Med 6.01 (1) is renumbered Nat Med 6.01 (1) (intro.) and amended to read:

**Nat Med 6.01 (1) (intro.)** Except as otherwise conflicts with any other rule or statute or as permitted by sub. (2), a limited-scope naturopathic doctor may only engage in the following practices; specified in s. 466.01 (6) (a) 1. a. to c. and 3. a. to c., Stats.

SECTION 5. Nat Med 6.01 (1) (a) and (b) and (c) and (d) are created to read:

**Nat Med 6.01 (1) (a)** Ordering and performing physical and laboratory examinations, for diagnostic purposes, consistent with naturopathic education and training, including the following:

1. Diagnostic or evaluation methods.
2. Physical examinations.
3. Clinical laboratory tests.

(b) Dispensing, administering, ordering, or performing any of the following:

1. Health education and health counseling.
2. Food, extracts of food, nutraceuticals, vitamins, amino acids, minerals, enzymes, botanical medicines, homeopathic medicines, and dietary supplements.
3. Hot or cold hydrotherapy, naturopathic physical medicine, the use of therapeutic medical equipment, and therapeutic exercise.

(c) A limited-scope naturopathic doctor may not recommend, dispense, or administer nonprescription drug products.

SECTION 6. Nat Med 6.01 (2) is amended to read:

**Nat Med 6.01 (2)** ~~A~~ Except as specified in subs. (3), a limited-scope naturopathic doctor may extend their scope of practice by petitioning the board. This petition shall include details of the expansion of scope and proof of qualifications to perform the requested practice pursuant to s. 466.05 (2) (a) 2., Stats.

SECTION 7. Nat Med 6.01 (3) is created to read:

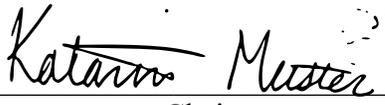
**Nat Med 6.01 (3)** Notwithstanding subs. (1) and (2), a limited-scope naturopathic doctor shall utilize only the following routes of administration: oral, nasal, auricular, and transdermal, provided such utilization is consistent with the naturopathic doctor's education and training. The specific route used shall be consistent with the properties of the substance and the desired clinical effect.

SECTION 8. EFFECTIVE DATE. The rules adopted in this order shall take effect on the first day of the month following publication in the Wisconsin Administrative Register, pursuant to s. 227.22 (2) (intro.), Stats.

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(END OF TEXT OF RULE)  
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This Proposed Order of the Naturopathic Medicine Examining Board is approved for submission to the Governor and Legislature.

Dated 1-28-26

Agency   
Chairperson  
Naturopathic Medicine Examining Board

## ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected	2. Date October 10, 2025
3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) Nat Med 1, 2, and 6 (Permanent Rule)	
4. Subject Scope of practice	
5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input checked="" type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S	6. Chapter 20, Stats. Appropriations Affected s.20.165 (1)(g)
7. Fiscal Effect of Implementing the Rule <input type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input checked="" type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input type="checkbox"/> Could Absorb Within Agency's Budget	
8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses <b>(if checked, complete Attachment A)</b>	
9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137(3)(b)(1). \$0	
10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137(3)(b)(2)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11. Policy Problem Addressed by the Rule The Naturopathic Medicine Examining Board reviewed chapters Nat Med 1, 2, and 6, to provide clarity regarding the scope of practice of naturopathic doctors and limited-scope naturopathic doctors because the current rules concerning scope of practice are unclear about the boundaries of these practitioners' activities in their practice, such as the limitations of intravenous vitamin treatments. The review prompted the following changes:  <ol style="list-style-type: none"><li>1. Creation of a definition of "routes of administration" in Nat Med 1.02.</li><li>2. Addition of a provision in Nat Med 2.03 that specifies which routes of administration a naturopathic doctor may utilize provided it is consistent with the naturopathic doctor's education and training.</li><li>3. Creation of a list in Nat Med 6.01 explaining limited-scope naturopathic doctors' scope of practice, which includes a provision that specifies which routes of administration a limited-scope naturopathic doctor may utilize provided it is consistent with the limited-scope naturopathic doctor's education and training. This list also includes a provision about the limitations a limited-scope naturopathic doctor has regarding nonprescription drug products.</li></ol>	
12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments. The rule was posted on the Department's website for 14 days to solicit public comment on economic impact, including how the proposed rules may affect businesses, local government units, and individuals. No comments were received.	
13. Identify the Local Governmental Units that Participated in the Development of this EIA. None	
14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) DSPS estimates a total of 5,900.00 in one-time and \$5,500.00 in ongoing staffing costs to implement the rule. The	

## ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

estimated need for 0.1 limited term employee (LTE) is for inputting new code provisions into License, staff training on new provisions, rule promulgation, coordination of board meeting agendas, review of exam questions, legal review and consultation with board and Secretary's office. The estimated annual staffing need for a 0.1 full time employee (FTE) is for intake and processing of new complaints, screening and prosecution of cases, investigation of complaints, paralegal duties, processing record requests, monitoring of disciplined licensees, preparing of reports and other inquiries. The one-time and annual estimated costs cannot be absorbed in the currently appropriated agency budget.

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15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule

The benefits of implementing this rule are provide clarity regarding the scope of practice of naturopathic doctors and limited-scope naturopathic doctors. If the rules are not updated, this will create confusion among stakeholders regarding what practices are within or outside their scope of practice.

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16. Long Range Implications of Implementing the Rule

The long range implications of implementng this rule is clear requirements for the scope of practice of naturopathic doctors and limited-scope naturopathic doctors in Wisconsin.

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17. Compare With Approaches Being Used by Federal Government

N/A

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18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

Illinois

Illinois does not currently license naturopathic doctors.

Iowa

Iowa does not currently license naturopathic doctors.

Michigan

Michigan does not currently license naturopathic doctors.

Minnesota

Minnesota authorizes registered naturopathic doctors to perform physical and laboratory examinations for diagnostic purposes and permits the administration, prescription, and dispensing of a range of substances, including foods, vitamins, botanical medicines, homeopathic medicines, and nonprescription drugs. Minnesota also allows the use of naturopathic physical medicine, encompassing modalities like hydrotherapy, massage, and the therapeutic application of heat, cold, and non-ionizing radiation. Minnesota prohibits naturopathic doctors from prescribing or administering legend drugs or controlled substances, performing major surgical procedures, or using interventions such as general or spinal anesthesia. [Section 147E.05 MN Statutes]

Minnesota does not have an equivalent to the limited-scope naturopathic doctor license in Wisconsin.

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19. Contact Name

Sofia Anderson

20. Contact Phone Number

(608) 261-4463

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This document can be made available in alternate formats to individuals with disabilities upon request.

**ADMINISTRATIVE RULES**  
**Fiscal Estimate & Economic Impact Analysis**

**ATTACHMENT A**

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1. Summary of Rule's Economic and Fiscal Impact on Small Businesses (Separately for each Small Business Sector, Include Implementation and Compliance Costs Expected to be Incurred)

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2. Summary of the data sources used to measure the Rule's impact on Small Businesses

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3. Did the agency consider the following methods to reduce the impact of the Rule on Small Businesses?

- Less Stringent Compliance or Reporting Requirements
  - Less Stringent Schedules or Deadlines for Compliance or Reporting
  - Consolidation or Simplification of Reporting Requirements
  - Establishment of performance standards in lieu of Design or Operational Standards
  - Exemption of Small Businesses from some or all requirements
  - Other, describe:
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4. Describe the methods incorporated into the Rule that will reduce its impact on Small Businesses

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5. Describe the Rule's Enforcement Provisions

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6. Did the Agency prepare a Cost Benefit Analysis (if Yes, attach to form)

- Yes    No
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