

Academic Achievement v. Regulation: Using the Title Doctor

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Academic institutions award a terminal degree in a variety of professions. Examples include Doctor of Nursing Practice, Doctor of Philosophy, Medical Doctor, Doctor of Osteopathy, Doctor of Veterinary Medicine, Doctor of Psychology, Doctor of Podiatric Medicine, and Doctor of Education. The degree confers the right to use the title.

In today's complex world, should using the title of one's academic terminal degree be restricted in healthcare settings? In California, three nurses who held a Doctor of Nursing Practice (DNP) degree sued the state claiming that the California Code, Business and Professions Code - Section 2054, a statute that restricts using the title "doctor" to licensed physicians, violated their first amendment right of free speech. In the case of *Palmer v. Bonta*, the U.S. District Court judge upheld the law, ruling that the use of the term "doctor" was commercial speech and considered misleading. The court used the American Medical Association's *Truth in Advertising Survey* to support the decision, citing patient confusion in identifying a DNP versus an MD.

The court also suggested the title was a financial motivator, used to influence patients to seek services from one calling themselves "doctor" (American Medical Association, 2025).

Indiana, Minnesota, and Tennessee have similar laws, calling it truth in advertising (O'Reilly, K.B., 2025). New Jersey takes a different approach. The New Jersey Health Care Transparency Act, passed in 2020, requires "any advertisement of health care professionals, licensed by the Division of Consumer Affairs, any principal department of the Executive Branch of State government, or any entity within any department or any other entity hereafter created to license or otherwise regulate a health care profession, to include the type of licensure the professional was issued" (New Jersey Health Care Transparency Act, 2020). Healthcare professionals must display their full name, credentials, and photo, to clearly identify who they are and what care they are licensed to provide. This avoids confusion in practice and provides clarity in scope of practice.

In the healthcare setting, the American Association of Nurse Practitioners (AANP) supports the use of the title "doctor" for those doctoral prepared nurses and other health care providers holding a terminal degree. AANP values and supports the patient's and public's rights to know the academic preparation of those administering their care. "Laws and regulations must reject anticompetitive and punitive measures that unnecessarily prohibit nurses and other health professionals from accurately communicating their education, licensure and certifications to patients and the public" (American Association of Nurse Practitioners, 2025).

While it is expected that nursing organizations will continue their national efforts to change the laws that prohibit use of the title 'doctor', nurses must continue to advocate for their right to full practice authority, ethically identifying their licensure and earned title with transparency in the healthcare setting. ■

References

- American Association of Nurse Practitioners (2025) *Use of titles and credentials in the clinical setting*. Retrieved 12/22/25 <https://www.aanp.org/advocacy/advocacy-resource/position-statements/use-of-titles-and-credentials-in-the-clinical-setting>
- American Medical Association (2025, September 26). *Court upholds California's truth in advertising law as constitutional*. Retrieved 12/22/25 from <https://www.ama-assn.org/health-care-advocacy/advocacy-update/sept-26-2025-judicial-advocacy-update>
- FindLaw. (n.d.). *California Code, Business and Professions Code - BPC § 2054*. Retrieved 12/22/25 <https://codes.findlaw.com/ca/business-and-professions-code/bpc-sect-2054/>
- New Jersey Health Care Transparency Act, L. 2020, c. 133, § 1 (codified at N.J. Rev Stat § 45:1-67). Retrieved 12/22/25 <https://legiscan.com/NJ/text/S2465/id/2241023>
- Nurse .org (2025, September 9). *Nurses can't be called "doctor" in CA, even with a doctorate degree — judge rules*. Retrieved 12/22/25 <https://nurse.org/news/california-nurses-doctor-title-ban-court-ruling/>
- O'Reilly, K.B. (2025, October 3). *Federal court agrees: NPs can't call themselves "doctor."* American Medical Association. Retrieved 12/22/25 <https://www.ama-assn.org/practice-management/scope-practice/federal-court-agrees-nps-can-t-call-themselves-doctor>