

New Jersey State Nurses Association (NJSNA) Position Statement Affirming the Use of the Title Doctor by Nurses with Doctoral Degrees

Statement

The New Jersey State Nurses Association (NJSNA) asserts that patients have a fundamental right to full transparency regarding the credentials of their healthcare providers. In alignment with this principle, NJSNA fully supports and affirms the right of nurses who have earned doctoral degrees, such as the Doctor of Nursing Practice (DNP) or the Doctor of Philosophy (PhD), to use the title Doctor.

Explanation of Issues

In the case of *Palmer v. Bonta*, DNP-prepared nurses challenged a California law (FindLaw, n.d.) restricting the title Doctor to licensed physicians, arguing it violated their First Amendment rights. A U.S. District Court judge upheld the law, classifying the use of the title by non-physicians as potentially misleading commercial speech. The ruling was supported by the American Medical Association's (AMA) *Truth in Advertising Survey*, which demonstrated patient confusion in distinguishing DNPs from MDs. The court also noted that the title could serve as a financial motivator to attract patients (American Medical Association, 2025).

Indiana, Minnesota, and Tennessee have similar laws to California restricting the use of the title Doctor by physicians as truth in advertising (O'Reilly, 2025). New Jersey takes a different approach. The *New Jersey Health Care Transparency Act* (2020), signed into law on December 14, 2020, mandates that healthcare professionals communicate their licensure and degree to patients.

NJSNA acknowledges nurses' right to use their earned title and practice to the full extent of their education and licensure. Recognizing the academic achievements of all healthcare professionals, including nurses, fosters interprofessional respect and ultimately benefits patient care across all settings.

Rationale

Academic institutions award a terminal degree in a variety of professions. The degree confers the right to use the title. The Doctor title is an earned acknowledgment of the highest level of academic achievement and clinical or research expertise in the nursing profession.

To ensure clarity and prevent public confusion, NJSNA advocates for the use of the Doctor title in conjunction with the professional's specific licensure and degree. This practice provides more information to the patient, not less, and respects the professional accomplishments of the individual.

References

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/>

Greenbaum, P. (2026). Academic Achievement v. Regulation: Using the Title Doctor. *New Jersey Nurse*, 56(2), 11.

New Jersey Health Care Transparency Act, N.J. Stat. Ann. § 45:1-67 (2020).
https://njleg.state.nj.us/bill-search/2020/S2465/bill-text?f=PL20&n=133_

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>

Formulated: 1/12/2026

Written by: COPP Position Statement Subcommittee

Margaret Daingerfield, EdD, RN, CNE, Sandra Foley, DNP, RN, Paula Greenbaum, MSN, RN, CMSRN, NPD-BC, CHPN, Laurie Huryk, MSN, RN, NI-BC, Susan H. Weaver, PhD, RN, CRNI, NEA-BC, and Ken Wolski, MPA, RN

Approved: Congress on Policy and Practice 1/13/2026

Adopted: NJSNA Board of Directors 3/24/2026