



**Connecticut State Medical Society
Connecticut Chapter of the American College of Physicians
Connecticut Chapter of the American College of Surgeons
Testimony on Senate Bill 261 An Act Concerning Naturopathic Medicine**

**Public Health Committee
March 7, 2012**

Senator Gerratana, Representative Ritter and Members of the Public Health Committee, on behalf of the more than 8,500 members of the Connecticut State Medical Society (CSMS) and the Connecticut Chapters of the American College of Physicians and the American College of Surgeons, thank you for opportunity to provide this testimony in opposition to **Senate Bill 261 An Act Concerning Naturopathic Medicine.**

This committee successfully passed legislation last session establishing a formal process for the submission and review of requests from health professionals seeking to revise or alter existing scopes of practice. Under Public Act 11-209, committees of appropriate and impacted professionals would be established under the direction of the Department of Public Health (DPH). Public Act 11-209 delineated a comprehensive list of discussion points as well as a significant list of factors to be included such as curriculum, training, supervision, access to care, public need, etc.

While the naturopaths did subsequently submit a request to DPH under the scope of practice process, their proposal was not selected by DPH for review. CSMS fully believes that prior to any legislation moving forward an appropriate review should take place through the legislatively imposed process for scope of practice review. We believe it was the intent of PA 11-209 to ensure that such requests receive a proper review and discussion among professionals prior to entering the legislative process. Individuals, organizations or associations of health care professionals should not be able to circumvent a process designed for medical and clinical review and discussion before changes occur to scope of practice in Connecticut. To allow a proposal that clearly represents a change to the scope of practice for naturopathic practitioners, as acknowledged by proponents through their recent submission to DPH, appears to contradict the intentions of the committee less than one year ago.

CSMS was supportive and excited by the passage of PA 11-209. Several review committees were established and many physicians volunteered to participate and spent a significant amount of time and energy to make the system work. It is our fear that circumvention of the process so soon after its establishment will harm our ability to find interested and concerned professionals to participate in future proceedings. CSMS also questions the cost of implementing PA 11-209 if it is not to be used for its intended purpose, especially at a time when state resources are so scarce. For this committee and the legislature to develop a process that requires and authorizes state resources, and then allow it to be circumvented raises questions of both its utility and the wisdom of funding such a process moving forward.

B-12 injections have the potential to mask significant medical conditions, including (but not limited to) Crohn's disease, pancreatic insufficiency and autoimmune atrophic gastritis, as

pointed out in testimony from other physician groups such as the Connecticut Academy of Family Physicians. The statutorily established scope of review process could address and discuss any naturopathic training to identify these and other conditions, that may be masked by B-12 injections, If they are in fact masked, and not treated by a trained professional, these conditions would cause the patient harm and potentially cause even more severe medical conditions. There is no evidence that naturopaths are trained in these conditions or able to apply evidence-based medicine to treat these conditions. Years of training are required for physicians and other health care professionals to provide injections of medication and other injectable agents and the same should be required for naturopaths.

In closing, we must point out that leading naturopathic associations are divided over the issue. The American Association of Naturopathic Physicians and the American Naturopathic Medical Association disagree on this issue as well as others regarding the scope of naturopathic medicine.

Please oppose SB 261 and allow the existing scope review process work.