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The Connecticut Dermatology and Dermatologic Surgery Society
Connecticut State Medical Society

March 20, 2013

Testimony in opposition to

H.B. No. 6592 AN ACT CONCERNING CERTIFICATION OF CLASSICAL HOMEOPATHS

Good Morning Senator Gerratana, Representative Johnson and other distinguished members of the Public Health Committee. My name is Dr. Steven Thornquist, I am a board certified ophthalmologist practicing in Trumbull Connecticut, the past president of the Connecticut Society of Eye Physicians and an officer in the Connecticut State Medical Society. I am here with an ophthalmology colleague, Dr. David Emmel, whom like me, participated in the scope review process with the DPH with regard to Homeopathy representing more than 8,500 physicians and physicians in training members of the several organizations listed on our written testimony. We are here to oppose H.B. No. 6592 AN ACT CONCERNING CERTIFICATION OF CLASSICAL HOMEOPATHS on behalf of over 1000 physicians in Ophthalmology, Ear Nose and Throat, Dermatology, and Urology and all of our patients.

Both Dr. Emmel and I actively participated in the scope expansion review process that covered this specific request and would like to express our collective deep appreciation to the Legislature for the hard work that went into generating Public Act 11-209, the act that authorizes Scope of Practice Review Committees. This thoughtful law has created a process administered by the DPH that carefully examines scope expansion requests in the full light of their potential impact on the citizens of the state of Connecticut. The committees are composed of representatives from those groups that would be impacted should legislation be enacted in accordance with the requests submitted. The Public Health Committee has before it the Scope of Practice Committee Report on Classical Homeopaths, a report that uncovers numerous flaws in the Homeopathy for Connecticut request and provides little if any evidence that needs are not currently being fulfilled, nor that any benefit that would accrue the citizens of Connecticut should this concept progress to become statute.

Some of the critical findings of this report:

- The petitioners failed to establish a level of education sufficient to serve the public safety.
- Candidates for homeopathic certification are not required to complete accredited education and training programs, unlike all other health care and health related practitioners regulated by the DPH.
- The petitioners failed to provide adequate data regarding the utilization of homeopathy.
- The petitioners failed to provide adequate data concerning the demand for homeopathy.

- The petitioners failed to show that Connecticut residents are not able to access homeopathic services or that their health status has been negatively impacted as a result of any such inability to access homeopathic care.
- The petitioners failed to show that increasing access to homeopathy would substantially reduce health care costs while simultaneously improving the health of the population.
- The petitioners failed to show that the public would be adequately protected from the mis-impression that homeopathic care is a medical profession that seeks to diagnose and treat disease.
- The request as submitted has no provision for DPH oversight and no provision to ensure that homeopathic practitioners do not engage in specifically prohibited activities.
- The request as submitted does not allow for either investigation or enforcement of provisions of the law.

Classical homeopathy essentially reflects the thinking of one man, Samuel Hahnemann, at the end of the 18th century when scientific thought was still in its infancy and medical knowledge was limited to anatomy and crude surgery. Since then science, and medical science in particular, have progressed exponentially, but homeopathic practice and knowledge remain locked in the late 18th century, rooted in concepts that have not evolved and that stand in stark contrast to our current understanding of physics, chemistry, and physiology that form the basis for rational medical thought and practice.

As a physician and a member of the committee that reviewed the classical homeopathy scope expansion request I question the claim that homeopathy is not intended to be the practice of medicine and that classical homeopaths do not diagnose and treat disease. According to Webster's dictionary, "diagnose" is defined as "to recognize (as a disease) by signs and symptoms; or to analyze the cause or nature of [a problem]". Homeopaths describe their activities as listening to symptoms, determining the cause of those symptoms, and deciding on the appropriate remedy. To me that certainly sounds like a diagnosis. In fact, homeopathic representative Abbey Beale, as part of her presentation to the committee, described using a remedy derived from onion to treat itching eyes and an extract of bee to treat a bee sting. Calling homeopathic treatments "remedies", avoiding the use of the word "diagnosis", and providing disclaimers cannot and will not disguise the fact that homeopaths and classical homeopaths, even withstanding their claim to a more holistic approach, attempt to diagnose and treat disease and do so with virtually no medical training. Their schools call themselves medical colleges and their practices will make it appear to their patients that they are indeed a medical profession. Even the National Center for Homeopathy proclaims "Homeopathy is a form of alternative medicine" on its website. Signing a disclaimer as part of a flurry of intake forms will do little to redress that impression. The potential for public confusion is immense.

This request claims to be asking for tighter regulation of homeopathy than other states offer, with increased educational requirements, but Connecticut already offers a high level of regulation, its homeopathic physicians must also be MD's or DOs first, with all the training that requires, and this request would actually lower that standard.

Certification as a Classical Homeopath (CCH) by the Council for Homeopathic Certification (CHC) is requested as a requirement for this new, lower standard for practice in Connecticut. The requirements for such certification offer limited protection for citizens of this state. While there are, indeed, a number of requirements listed for certification, those requirements are loosely enforced, with many "approved" programs of training consisting primarily of weekend seminars in local hotels and "schools" with no actual street address. Some of these "approved" schools do not even require a high school diploma for entry (see attached email from the director of one such program), though some require at least an associates degree before the Homeopathic training. "Clinical" care can be almost completely studied remotely, by video and online, sometimes with

interaction, but not often, and definitely not always. There is an exam that must be passed, but its validity has only recently begun to be investigated, and that review is “underway” according to the CHC itself. Candidates may have three chances to pass the four segments of the exam, and do not have to pass more than one segment on any given try. The website offers extensive hints on how to pass the clinical reviews, and a 40 page book on the test itself is offered for purchase. The test has not been accredited or evaluated by any independent authority on testing. The CHC is a private company offering certificates for a price. This request would grant them a monopoly on a requirement for practice in Connecticut, with no allowance or suggestion of state control or influence on the validity of certification, the rates for certification or the requirements or level of expertise needed for certification, and no way to monitor future changes to those requirements. We do better with our utilities in protecting consumers.

Consumer protection has a broad mandate in modern times. We protect the public from unlicensed, undertrained contractors, tree surgeons, and even hairdressers. Medical care deserves no less. The simple days when *caveat emptor*, or “buyer beware” could be applied are long gone even in arenas where the state has no stake at all, such as in the purchase of a new or used car. So-called “lemon laws’ protect consumers from deceptive sales practices. In health care this is much more important not simply because the state pays for some of it, but because the claims are often more outrageous, the profit motive not insignificant, and the ability of the average person to understand the validity of claims far less certain. Further, the short term and long term cost to the patients in missed opportunity for effective treatment, and prolongation of suffering, can be devastating.

As the Scope of Practice Review shows, this request to lower the current standard for homeopathic practice in Connecticut to simple CCH certification comes up short on many counts. There is no data, short of a few anecdotes, demonstrating a need, the certification itself has not been validated, and the potential for confusion in the public regarding level of training and identity of their healthcare provider is immense. I urge you to oppose this legislation.

Thank you



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Testimonial

My membership in NCH means the world to me. I first began my membership when I was a new mom first learning about homeopathy (and babies for that matter!) This was almost 20 years ago! Now, I am a Homeopath with a thriving practice in Beverly Hills. My NCH membership serves me just as much today as a professional as it did way back when I was such a novice. Being part of NCH provides me with world-wide resources & networking, easy access to workshops and conferences staffed by renowned Homeopaths, and the always interesting Homeopathy Today magazine. Access to alternative Health modalities is a right! So now - more than ever - the NCH is vital in maintaining this right and keeping us informed with all things Homeopathic! Blessings,
- Kathleen Slonager, RN, DIHOM, ADS, AE-C, CCH

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Cancer Research Symposium Showcases Homeopathy and Other CAM	01/03/2013 - 13:32
First Full Study of RCTs in Veterinary Homeopathy Published	01/01/2013 - 13:01
CDC Flu Map For Week of December 22, 2012	12/31/2012 - 10:07
Homeopathic and Naturopathic Support for Influenza	12/26/2012 - 14:07
Abraham Lincoln and his Team of Homeopaths	12/25/2012 - 11:26
NCH Seeks End Of Year Donations To Help Protect Homeopathy	12/21/2012 - 13:05

What is Homeopathy?

Homeopathy is a system of medicine that is based on the Law of Similars.
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Attention Parents

Learn how to treat your child's earaches, fever and flu safely, with homeopathy.

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Abby Beale

Sunday, April 21
12:30 PM - 2:00 PM

Former corporate productivity specialist *Abby is a member of NCH Board of Directors.*



Panel: Growing Your Homeopathic Business

This panel discussion, moderated by NCH Board Member Abby Beale, will highlight four "successful" homeopathic practitioners from our diverse membership who have been in business for over 5 years. We will talk about what they did (or shouldn't have done!) when building their homeopathic practice. We will talk about clientele building and marketing, business management issues including billing options, office procedures, and more. In addition, we ask you to bring your most pressing questions as we will gather them at the start of the session and address them as time allows. If you are a homeopath just starting out, a few years into a practice or just thinking about getting started, this session will provide you with some immediately useable ideas to move you forward.

A member of the NCH Board of Directors, Abby is a graduate of the New England School of Homeopathy and a CCH candidate. She practices in Massachusetts. As a corporate productivity specialist, she has helped busy people work smarter, faster and just plain better. Abby is author of a number of books on speed reading, as well as her own online speed-reading course.

Re: prerequisites for Caduceus curriculum

From: Willa Keizer <willakeizer@gmail.com>
To: humus81524@mypacks.net
Subject: Re: prerequisites for Caduceus curriculum
Date: Jan 9, 2013 4:30 PM

Hello,

Nice to hear from you. There are no prerequisites.

Please let me know if you have any other questions. You might enjoy listening to the Introduction to the Caduceus Program on the lecture page of our site.

Best wishes,
Willa

On Jan 9, 2013 1:26 PM, <humus81524@mypacks.net> wrote:

Dear Ms. Keizer:

I am interested in taking some of your courses, but I don't see what pre-requisites are required to take them, other than the prior seminars (i.e., basic before advanced curriculum) noted on your website. Can you tell me what is required?

S. Thorn

Admission Requirements for American Medical College of Homeopathy

Homeopathic Practitioner Program

This program is open to non-medically licensed practitioners as well as licensed practitioners. All applicants must possess an Associate's degree. A minimum GPA of 2.5 is required in all post-secondary work. Non-medically licensed applicants must also successfully complete the following course work either during or prior to the program at an accredited college:

- Anatomy: 3 semester credits (33 hours of lecture)
- Physiology: 3 semester credits (33 hours of lecture)
- Pathology: 4 semester credits (40 hours of lecture)
- CPR Training

Prerequisite courses not taken within seven years of matriculation into the program are subject to review. Classes can be completed prior to or concurrent with the program, as co-requisites. Off campus students enrolled in the Homeopathic Practitioner Certificate Program are required to have a computer with high-speed internet access and basic computer familiarity.

Acute Care Programs

There are no prerequisites for the Acute Care and Distance Learning Programs.

Integrative Medicine Program

There are no prerequisites for the Integrative Medicine Program.

Preceptorship Programs

The prerequisites for the Preceptorship I program is that the student must currently be enrolled and in good standing in an accredited Naturopathic, Osteopathic, Medical or Integrative Health College. The prerequisite for the Preceptorship II Program is that the student must be enrolled or in good standing in an accredited Naturopathic Medical School.

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[Br J Clin Pharmacol.](#) 2002 Dec;54(6):577-82.

A systematic review of systematic reviews of homeopathy.

[Ernst E.](#)

Department of Complementary Medicine, School of Sport & Health Sciences, University of Exeter, 25 Victoria Park Road, Exeter EX2 4NT UK. E.Ernst@exeter.ac.uk

Abstract

Homeopathy remains one of the most controversial subjects in therapeutics. This article is an attempt to clarify its effectiveness based on recent systematic reviews. Electronic databases were searched for systematic reviews/meta-analysis on the subject. Seventeen articles fulfilled the inclusion/exclusion criteria. Six of them related to re-analyses of one landmark meta-analysis. Collectively they implied that the overall positive result of this meta-analysis is not supported by a critical analysis of the data. Eleven independent systematic reviews were located. Collectively they failed to provide strong evidence in favour of homeopathy. In particular, there was no condition which responds convincingly better to homeopathic treatment than to placebo or other control interventions. Similarly, there was no homeopathic remedy that was demonstrated to yield clinical effects that are convincingly different from placebo. It is concluded that the best clinical evidence for homeopathy available to date does not warrant positive recommendations for its use in clinical practice.

PMID: 12492603 [PubMed - indexed for MEDLINE] PMCID: PMC1874503 **Free PMC Article**

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The Lancet, [Volume 366, Issue 9487](#), Pages 726 - 732, 27 August 2005
doi:10.1016/S0140-6736(05)67177-2 [Cite or Link Using DOI](#)

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Are the clinical effects of homoeopathy placebo effects? Comparative study of placebo-controlled trials of homoeopathy and allopathy

[Aijing Shang MD a](#), [Karin Huwiler-Müntener MD a](#), [Linda Nartey MD a](#), [Peter Jüni MD a b](#), [Stephan Dörig a c](#), [Jonathan AC Sterne PhD b](#), [Daniel Pewsner MD a d](#), Prof [Matthias Egger MD a b](#)  

Summary

Background

Homoeopathy is widely used, but specific effects of homoeopathic remedies seem implausible. Bias in the conduct and reporting of trials is a possible explanation for positive findings of trials of both homoeopathy and conventional medicine. We analysed trials of homoeopathy and conventional medicine and estimated treatment effects in trials least likely to be affected by bias.

Methods

Placebo-controlled trials of homoeopathy were identified by a comprehensive literature search, which covered 19 electronic databases, reference lists of relevant papers, and contacts with experts. Trials in conventional medicine matched to homoeopathy trials for disorder and type of outcome were randomly selected from the Cochrane Controlled Trials Register (issue 1, 2003). Data were extracted in duplicate and outcomes coded so that odds ratios below 1 indicated benefit. Trials described as double-blind, with adequate randomisation, were assumed to be of higher methodological quality. Bias effects were examined in funnel plots and meta-regression models.

Findings

110 homoeopathy trials and 110 matched conventional-medicine trials were analysed. The median study size was 65 participants (range ten to 1573). 21 homoeopathy trials (19%) and nine (8%) conventional-medicine trials were of higher quality. In both groups, smaller trials and those of lower quality showed more beneficial treatment effects than larger and higher-quality trials. When the analysis was restricted to large trials of higher quality, the odds ratio was 0.88 (95% CI 0.65–1.19) for homoeopathy (eight trials) and 0.58 (0.39–0.85) for conventional medicine (six trials).

Interpretation

Biases are present in placebo-controlled trials of both homoeopathy and conventional medicine. When account was taken for these biases in the analysis, there was weak evidence for a specific effect of homoeopathic remedies, but strong evidence for specific effects of conventional interventions. This finding is compatible with the notion that the clinical effects of homoeopathy are placebo effects.

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Mayo Clin Proc. 2007 Jan;82(1):69-75.

Homeopathy for childhood and adolescence ailments: systematic review of randomized clinical trials.

Altunç U, Pittler MH, Ernst E.

Complementary Medicine, Peninsula Medical School, University of Exeter, Exeter, United Kingdom.

Abstract

OBJECTIVE: To assess the evidence of any type of therapeutic or preventive intervention testing homeopathy for childhood and adolescence ailments.

METHODS: Systematic literature searches were conducted through January 2006 in MEDLINE, EMBASE, AMED, CINAHL, Cochrane Central, British Homeopathic Library, ClinicalTrials.gov, and the UK National Research Register. Bibliographies were checked for further relevant publications. Studies were selected according to predefined inclusion and exclusion criteria. All double-blind, placebo-controlled randomized clinical trials of any homeopathic intervention for preventing or treating childhood and adolescence ailments were included. According to the classification of the World Health Organization, the age range defined for inclusion was 0 to 19 years. Study selection, data extraction, and assessment of methodological quality were performed independently by 2 reviewers.

RESULTS: A total of 326 articles were identified, 91 of which were retrieved for detailed evaluation. Sixteen trials that assessed 9 different conditions were included in the study. With the exception of attention-deficit/hyperactivity disorder and acute childhood diarrhea (each tested in 3 trials), no condition was assessed in more than 2 double-blind randomized clinical trials. The evidence for attention-deficit/hyperactivity disorder and acute childhood diarrhea is mixed, showing both positive and negative results for their respective main outcome measures. For adenoid vegetation, asthma, and upper respiratory tract infection each, 2 trials are available that suggest no difference compared with placebo. For 4 conditions, only single trials are available.

CONCLUSION: The evidence from rigorous clinical trials of any type of therapeutic or preventive intervention testing homeopathy for childhood and adolescence ailments is not convincing enough for recommendations in any condition.

PMID: 17285788 [PubMed - indexed for MEDLINE]

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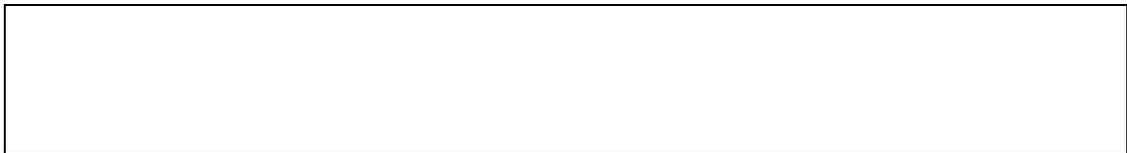
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NCCAM

John (Jack) Killen, Jr., M.D.,



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