

The Connecticut Dermatology and Dermatologic Surgery Society
Connecticut ENT Society
Connecticut Society of Eye Physicians
Connecticut Urology Society

February 20, 2013

OPPOSING Testimony
for the Public Health Committee

H.B. No. 5734 AN ACT ALLOWING NATUREOPATHS TO PRESCRIBE CERTAIN DRUGS.

Good Morning Senator Gerratana, Representative Johnson and other distinguished members of the Public Health Committee. My name is Dr. Steven Levine and I am a board certified otolaryngologist practicing in Trumbull, Connecticut, the past president Connecticut Ear Nose and Throat Society and the Connecticut State Medical Society legislative chair for medical specialties. I am here to oppose H.B. No. 5734 AN ACT ALLOWING NATUREOPATHS TO PRESCRIBE CERTAIN DRUGS, on behalf of over 1000 physicians in ENT, Dermatology, Ophthalmology and Urology and our patients.

First I would like to commend the committee for the passing of RB 5258: An Act Implementing the Recommendations of the Program Review and Investigations Committee Concerning Scope of Practice Determinations for Health Care Providers in 2010. This thoughtful bill has created a process that carefully examines scope expansion requests in the full light of their potential impact on the citizens of the state of Connecticut and I have personally participated in several of these requests. I found it to provide a fair and just forum for exploring all of the ramifications of scope expansion, education and access issues for which our state is always mindful of. It allows all impacted parties to participate in the discussion and gives us the time interested parties need to research the issue. It is unfortunate and a bit surprising that this issue of advanced scope by the natureopaths is here before us today and was not involved in the public review process and more startling is the request for prescriptive drugs.

Naturopathy involves the application of "natural" (nonpharmaceutical and non-

surgical) treatment modalities to encourage and facilitate the body's healing of itself. Webster's dictionary defines Naturopathy as "a system of disease that **avoids drugs** and surgery and emphasizes the use of natural agents...and physical means..." (emphasis added). Medical and osteopathic doctors spend many hours studying the actions, composition, and effects of pharmaceutical agents, and undergo years of supervised application of those concepts and use of medications before undertaking to prescribe such medications on their own. As noted in a 2009 AMA report on Naturopathy, "Compared to medical school and residency training, a naturopathic education consists of relatively few contact hours of study on pharmacological treatment of disease, and provides virtually no clinical reinforcement of pharmaceutical intervention on patients during clinical rotations or optional post-graduate training. Most drugs are considered toxic by naturopaths, so alternative treatments are instead prescribed. One important component to consider in the debate over naturopath licensure is whether a practitioner with such limited exposure to pharmaceuticals can appropriately treat patients who take prescription medicines regularly or who would likely benefit from pharmacological intervention." Indeed, University of Bridgeport's Naturopathy program requires 4 credit hours of pharmacology and no clear practical application of that knowledge in the clinical rotations, which focus on case analysis and natural remedies.

Further, there is division within Naturopathy regarding the safety of naturopathic prescribing. The American Naturopathic Medical Association has publicly stated "Naturopaths, Naturopathic Doctors, or Naturopathic Physicians have no business diagnosing, dispensing drugs, or performing surgeries." (from a suggested letter for ANMA members to protest ND prescribing, 2004) and "..A naturopath pretending to have the knowledge to practice in this manner is definitely a 'danger to the public'" (from an ANMA publication regarding a Washington state initiative to allow prescribing, 2006) (both excerpted from the above referenced AMA report)

Therefore it is a bit alarming that a non-medically trained individual would seek to use prescriptive medications. As Arnold Relman, MD, the world-renowned professor (now emeritus) of medicine and cardiology at Harvard noted in his 2001 review of the 2nd edition of the Textbook of Natural Medicine, the primary textbook for most Naturopathic education: "Primary care practitioners whose

education does not include the use of prescription drugs simply cannot be expected to provide effective and safe care for many serious conditions they are likely to encounter. While it is true that unnecessary or inappropriate use of drugs is harmful, and that even proper usage of drugs can sometimes cause serious reactions, there can be no doubt that on balance prescription drugs have been enormously beneficial, and that drugs will be even more important in the future. The anti-pharmaceutical bias of naturopathic education (as illustrated in the *Textbook*) therefore poses real risks for patients who rely on naturopaths for the management of their illnesses. Without prompt and appropriate drug therapy many patients with serious diseases will die” [N.B., a 3rd edition has since been published. There has been as yet no similar review done].

For medical professionals, the naturopathic profession’s reluctance and/or inability to apply evidence-based principles and scientific study its treatment modalities is also of great concern. Pharmaceutical agents are developed and refined by careful scientific study. Unfamiliarity with the methods of scientific critical thinking and the importance of critically evaluating the evidence for treatment and its efficacy can lead to dangerous misapplication of therapy. For example, naturopaths’ longstanding opposition to childhood vaccination has been demonstrated as recently as 1999, well after the remarkable decreases in childhood disease as a result of widespread vaccination had been documented. The mechanism of action and the efficacy of many naturopathic treatment modalities are not scientifically supported; yet practitioners of naturopathy continue to offer patients such treatments. Such behavior would not be tolerated in the practice of medicine.

The Connecticut Dermatology and Dermatologic Surgery Society
Connecticut ENT Society
Connecticut Society of Eye Physicians
Connecticut Urology Society

February 20, 2013

OPPOSING Testimony
for the Public Health Committee

H.B. No. 5734 AN ACT ALLOWING NATUREOPATHS TO PRESCRIBE CERTAIN DRUGS.

Good Morning Senator Gerratana, Representative Johnson and other distinguished members of the Public Health Committee. My name is Dr. Steven Levine and I am a board certified otolaryngologist practicing in Trumbull, Connecticut, the past president Connecticut Ear Nose and Throat Society and the Connecticut State Medical Society legislative chair for medical specialties. I am here to oppose H.B. No. 5734 AN ACT ALLOWING NATUREOPATHS TO PRESCRIBE CERTAIN DRUGS, on behalf of over 1000 physicians in ENT, Dermatology, Ophthalmology and Urology and our patients.

First I would like to commend the committee for the passing of RB 5258: An Act Implementing the Recommendations of the Program Review and Investigations Committee Concerning Scope of Practice Determinations for Health Care Providers in 2010. This thoughtful bill has created a process that carefully examines scope expansion requests in the full light of their potential impact on the citizens of the state of Connecticut and I have personally participated in several of these requests. I found it to provide a fair and just forum for exploring all of the ramifications of scope expansion, education and access issues for which our state is always mindful of. It allows all impacted parties to participate in the discussion and gives us the time interested parties need to research the issue. It is unfortunate and a bit surprising that this issue of advanced scope by the natureopaths is here before us today and was not involved in the public review process and more startling is the request for prescriptive drugs.

Naturopathy involves the application of "natural" (nonpharmaceutical and non-

surgical) treatment modalities to encourage and facilitate the body's healing of itself. Webster's dictionary defines Naturopathy as "a system of disease that **avoids drugs** and surgery and emphasizes the use of natural agents...and physical means..." (emphasis added). Medical and osteopathic doctors spend many hours studying the actions, composition, and effects of pharmaceutical agents, and undergo years of supervised application of those concepts and use of medications before undertaking to prescribe such medications on their own. As noted in a 2009 AMA report on Naturopathy, "Compared to medical school and residency training, a naturopathic education consists of relatively few contact hours of study on pharmacological treatment of disease, and provides virtually no clinical reinforcement of pharmaceutical intervention on patients during clinical rotations or optional post-graduate training. Most drugs are considered toxic by naturopaths, so alternative treatments are instead prescribed. One important component to consider in the debate over naturopath licensure is whether a practitioner with such limited exposure to pharmaceuticals can appropriately treat patients who take prescription medicines regularly or who would likely benefit from pharmacological intervention." Indeed, University of Bridgeport's Naturopathy program requires 4 credit hours of pharmacology and no clear practical application of that knowledge in the clinical rotations, which focus on case analysis and natural remedies.

Further, there is division within Naturopathy regarding the safety of naturopathic prescribing. The American Naturopathic Medical Association has publicly stated "Naturopaths, Naturopathic Doctors, or Naturopathic Physicians have no business diagnosing, dispensing drugs, or performing surgeries." (from a suggested letter for ANMA members to protest ND prescribing, 2004) and "..A naturopath pretending to have the knowledge to practice in this manner is definitely a 'danger to the public'" (from an ANMA publication regarding a Washington state initiative to allow prescribing, 2006) (both excerpted from the above referenced AMA report)

Therefore it is a bit alarming that a non-medically trained individual would seek to use prescriptive medications. As Arnold Relman, MD, the world-renowned professor (now emeritus) of medicine and cardiology at Harvard noted in his 2001 review of the 2nd edition of the Textbook of Natural Medicine, the primary textbook for most Naturopathic education: "Primary care practitioners whose

education does not include the use of prescription drugs simply cannot be expected to provide effective and safe care for many serious conditions they are likely to encounter. While it is true that unnecessary or inappropriate use of drugs is harmful, and that even proper usage of drugs can sometimes cause serious reactions, there can be no doubt that on balance prescription drugs have been enormously beneficial, and that drugs will be even more important in the future. The anti-pharmaceutical bias of naturopathic education (as illustrated in the *Textbook*) therefore poses real risks for patients who rely on naturopaths for the management of their illnesses. Without prompt and appropriate drug therapy many patients with serious diseases will die" [N.B., a 3rd edition has since been published. There has been as yet no similar review done].

For medical professionals, the naturopathic profession's reluctance and/or inability to apply evidence-based principles and scientific study its treatment modalities is also of great concern. Pharmaceutical agents are developed and refined by careful scientific study. Unfamiliarity with the methods of scientific critical thinking and the importance of critically evaluating the evidence for treatment and its efficacy can lead to dangerous misapplication of therapy. For example, naturopaths' longstanding opposition to childhood vaccination has been demonstrated as recently as 1999, well after the remarkable decreases in childhood disease as a result of widespread vaccination had been documented. The mechanism of action and the efficacy of many naturopathic treatment modalities are not scientifically supported; yet practitioners of naturopathy continue to offer patients such treatments. Such behavior would not be tolerated in the practice of medicine.