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**Connecticut State Medical Society Testimony in opposition to  
House Bill 6797 An Act Concerning The Practice of Naturopathy  
Public Health Committee  
March 16, 2015**

Senator Gerratana, Representative Ritter and members of the Public Health Committee, on behalf of the physicians and physicians in training of the Connecticut State Medical Society (CSMS), thank you for the opportunity to provide this testimony to you today in opposition to House 6797 An Act Concerning The Practice Of Naturopathy.

It is critically important for members of the Public Health Committee to understand that an expansion of the scope of practice for naturopaths came under a full review through the process established by PA 11-207. CSMS and several other specialties participated fully in that review, along with representatives of the naturopathic community. In its "Scope of Practice Review Committee Report on Naturopathic Physicians" provided to this committee in February of 2014, the Department of Public Health (DPH) concluded that based on the provided documentation, it is **not evident that the current minimum licensure requirements are adequate** to meet full implementation of the scope changes requested.

Yet last session, without the benefit of a public hearing and without input from those who participated in the scope review process or from DPH, the scope of practice for naturopaths was significantly altered with the passage of Section 69 of Public Act 231. This section added to statute language not only to expand the definition of naturopathy to include the "diagnosis, prevention and treatment of disease and health optimization by stimulation and support of the body's natural healing process, it also allows for the ordering of certain diagnostic tests and procedures, ordering of medical devices and medical equipment and removing earwax, spirometry, tuberculosis testing and venipuncture for blood testing."

Now, less than a year after implementation of that significant change in scope, naturopaths now seek to remove the foundation of their practice of mechanical and material sciences and replace it with the ability to practice physical and therapeutic sciences. This change might be seemingly small but the potential impact is significant. Use of the word "therapeutic," particularly when undefined as in HB 6797, could have significant implications and should not be overlooked, especially if it is intended to represent a deviation in philosophy from the promotion of the natural restorative and healing properties of the body toward active intervention in the healing process, the traditional domain of medical science as practiced by medical doctors. We have serious issues with the comingling of divergent health care philosophies.

Additionally, HB 6797 requires the Commissioner of the Department of Public Health (DPH) in consultation ONLY with the State Board of Naturopathic Examiners to report back to this committee with recommendations to expand the scope of naturopaths to include prescribing, dispensing and administering drugs. Unlike the process established by PA 11-207, no opportunity for involvement or comment from professions with concern about a significant expansion exists. Furthermore, the language expressly omits any input from the Connecticut Medical Examining Board. Finally, precedent will be set for another avenue of scope expansion, one that is not open to the public or any impacted party, but that is responsive only to the self-serving needs of the group seeking expansion, and carrying an additional price tag. What other groups will be encouraged to do the same, seeking legislative change through other commissioners instead of the time-honored and open approach of commissioners delivering testimony in public before committees?

Certain facts are irrefutable. A scope of practice review process occurred regarding the scope of practice for naturopaths. The subsequent DPH report from the review process questioned the ability of naturopaths regarding the expansions sought. Regardless, a statute change significantly increasing the scope of practice for naturopaths passed the General Assembly last session without the benefit of public input. Soon after the effective date of PA 14-231 and with no information regarding its impact, legislation is being heard to further increase the naturopath's scope with a presupposition that it will increase further next session. Where does it end?

Please oppose House Bill 6797.