

# HOMEOPATHY for CONNECTICUT

## Memorandum

**To:** Jennifer L. Filippone, Chief  
Practitioner Licensing and Investigations Section  
Department of Public Health

**From:** Abby Beale, Homeopathy for Connecticut

**Date:** August 3, 2012

**Subject:** Scope of Practice Request

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Homeopathy for Connecticut is proposing to expand the practice of homeopathy in Connecticut to nationally certified homeopaths. Accordingly, we are submitting the attached scope of practice request, as described in Public Act 11-209.

If you have any questions or need additional information, please feel free to contact me.

Thank you in advance for your consideration.

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# HOMEOPATHY for CONNECTICUT

## Scope of Practice Request

Submitted to the Connecticut Department of Public Health  
August 3, 2012

### 1. A plain language description of the request.

***Expand the practice of homeopathy in Connecticut to include board certified homeopaths – individuals who have successfully completed the educational requirements, passed the national certification exam and earned the designation of Certified Classical Homeopath (CCH).*** This proposal will increase consumer access to qualified homeopaths and allow well-trained professional homeopaths to provide homeopathic care in the state. Applicants will be required to have passed the certification exam offered by the national Council for Homeopathic Certification, a national organization that sets standards for the profession, examines and certifies professional homeopaths, and monitors compliance for continuing education.

The current scope of practice law in Connecticut regarding homeopathy, which limits the practice of homeopathy to physicians, is unnecessarily restrictive. The law was established in 1893 - over 100 years ago - and does not serve the public well. Nationally certified homeopaths should be allowed to practice in CT as they meet the highest standards of the profession.

Certified homeopaths do not practice medicine, do not diagnose or treat illness or disease, do not perform invasive procedures and do not represent themselves as medical professionals.

Homeopathy considers the entire individual and works to improve vitality and decrease susceptibility to illness. Homeopathic remedies are highly dilute and work on an energetic level, not a chemical level. As such, remedies do not interfere with the action of pharmaceuticals or other medicines.

This proposal can be implemented at little or no cost to the State. A medical examining board is not needed since certified homeopaths are non-medical practitioners. The Council for Homeopathic Certification has agreed to work with Connecticut to verify certification of practitioners as well as monitor compliance with continuing education requirements. In addition, revenue for the State of Connecticut could be generated through annual registration fees.

**2. Public health and safety benefits that the requestor believes will be achieved should the request be implemented and, if applicable, a description of any harm to public health and safety should the request not be implemented.**

Expanding the practice of homeopathy in Connecticut to nationally certified homeopaths provides the following benefits:

- Assures the availability of highly competent homeopaths.
- Allows greater freedom of choice.
- Provides greater access to homeopathy, a holistic form of health care that addresses the whole person as an individual in order to strengthen the constitution and thereby raise the general level of health.
- Provides greater access to well-chosen homeopathic remedies that stimulate the body's immune system to heal itself in a way that is safe, natural and non-toxic.

The national Council for Homeopathic Certification (CHC) sets the proficiency standards in the U.S. for professional homeopaths. The requirements for CHC certification are rigorous, requiring significantly more hours of homeopathic study and practice than is required for either licensed medical doctor homeopaths or naturopaths in Connecticut (see attached CHC certification requirements).

Professional competence is fostered by the continuing education requirements set by the CHC. The CHC monitors compliance with the continuing education requirements among Certified Classical Homeopaths and is willing to provide notification of compliance to the State of Connecticut (see attached letter).

The risk of harm to the public is negligible. Homeopathy is not a medical practice, homeopaths do not diagnose or treat disease nor perform invasive procedures, and homeopathic remedies are available to the public over the counter. A homeopathic remedy works on an energetic level by stimulating the body to heal itself. There are rarely consumer complaints, malpractice claims or investigations regarding any type of homeopathic provider. In Connecticut, there have been no malpractice decisions made against homeopaths.

**3. The impact that the request will have on public access to health care.**

This scope of practice change will expand the current limited availability of homeopathy throughout the state while assuring the highest level of professional competence. Homeopathy offers a holistic approach to support wellness and well being that is safe, cost effective and environmentally responsible.

Currently, access to homeopathic care is very restricted in Connecticut – more than any other state. There are only 10 licensed medical doctor homeopaths in the state (few of which practice homeopathy), and a limited number of naturopaths offer homeopathy. This has severely limited the availability of homeopaths in the state and the guidance they offer to the public.

According to the 2007 National Health Interview Survey, which included a comprehensive survey of complementary and alternative medicine (CAM) use by Americans, an estimated 3.9 million U.S. adults and approximately 900,000 children used homeopathy in the previous year.

**4. A brief summary of state or federal laws that govern the health care profession making the request.**

The Connecticut General Statute establishing the Homeopathic Medical Examining Board (CGA 20-8) was codified in 1893 – well over a century ago. CGA 20-12n defines homeopathic physicians and sets out requirements for licensure and oversight by the Connecticut Homeopathic Medical Examining Board. This law restricts the practice of homeopathy to medical doctors, which is unduly restrictive since homeopathy does not involve the practice of medicine.

Homeopathy is a distinct discipline and does not require training in other professions. Although some medical doctors do practice homeopathy, they represent a small minority of homeopathic practitioners in the U.S.

It's important to note that homeopathic remedies are sold over the counter and anyone is free to purchase and use them for self-care at home. Homeopathic remedies are regulated by the Federal Food and Drug Administration (FDA) and listed in the Homeopathic Pharmacopoeia of the United States.

There are no federal laws governing the practice of homeopathy.

**5. The state's current regulatory oversight of the health care profession making the request.**

The Connecticut Homeopathic Medical Examining Board oversees the practice of homeopathic physicians.

**6. All current education, training and examination requirements and any relevant certification requirements applicable to the health care profession making the request.**

The national Council on Homeopathic Certification provides rigorous standards and a national exam that assesses competency in the skills required for professional practice of homeopathy. To qualify as a nationally certified homeopath the Council for Homeopathic Certification requires that a person have:

- (1) 500 hours of homeopathic theoretical training,
- (2) College level courses in anatomy, physiology and pathology,
- (3) 390 hours of clinical experience including 10 supervised cases,
- (4) Passed the 6 hour national certification exam,
- (5) Presented five written cases taken without supervision, and
- (6) Passed the personal interview process.

To maintain this certification, practitioners must complete a minimum of 20 hours of continuing education each calendar year.

Homeopathy is a discipline unto itself, although some homeopaths also have training in other health professions such as acupuncture, chiropractic, massage therapy, naturopathy, nursing and medicine. Each certified homeopath is required to follow a clearly stated professional code of ethics and to meet annual requirements for continuing education.

There are a number of training programs for homeopaths throughout the U.S. that prepare individuals for certification as a classical homeopath. No such program currently exists in Connecticut.

The standards for homeopathic education adopted by the Accreditation Commission for Homeopathic Education in North America, are described in "*Standards and Competencies for the Professional Practice of Homeopathy in North America*" ([www.achena.org/Docs/2001\\_CHE\\_Standards\\_revised\\_1106.pdf](http://www.achena.org/Docs/2001_CHE_Standards_revised_1106.pdf))

**7. A summary of known scope of practice changes either requested or enacted concerning the health care profession in the five-year period preceding the date.**

There has been no scope of practice changes regarding homeopaths in the last five years (2007 – 2012). This current proposal to expand the practice of homeopathy in Connecticut to nationally certified homeopaths was pursued in the 2011 and 2012 legislative sessions.

**8. The extent to which the request directly impacts existing relationships within the health care delivery system.**

This proposal does not infringe on the scope of practice of any other profession. It also does not impact existing relationships within the health care delivery system. Certified homeopaths are a part of a larger community of alternative and complementary practitioners serving the public. They do not conflict with medical practice but provide complementary support.

**9. The anticipated economic impact of the request on the health care delivery system.**

Since there are very few homeopaths practicing in Connecticut due to the restrictiveness of current law, many individuals go out of state to find a well-qualified homeopath. Also, well trained and board certified homeopaths leave the state to practice their profession.

By allowing nationally certified homeopaths to practice in Connecticut, the general public is provided increased access to a low cost and alternative approach to health and wellness. Homeopathic practitioners will benefit by the increased access to, knowledge of and visibility of homeopathy in the state. Ultimately, well-trained board certified homeopaths will come to this state to practice. They will benefit from a community of well-qualified peers. This in turn will provide greater choice for consumers and create more visibility and demand for qualified practitioners of these services.

**10. Regional and national trends concerning licensure of the health care profession making the request and a summary of relevant scope of practice provisions enacted in other states.**

Throughout the U.S. homeopathy is a largely an unregulated profession. This is due to the fact that homeopaths do not practice medicine and that homeopathy has been shown to be very safe, working on an energetic rather than a chemical level.

- Only three (3) states license medical doctors to practice homeopathy (CT, AZ, and NV) – Connecticut’s law is from 1893. Of these, only Connecticut restricts the practice of homeopathy to medical doctors.
- Eight (8) states have Health Freedom laws allowing non-licensed, non-medical alternative and complementary care providers, including homeopaths, to provide their services: AZ, CA, RI, Idaho, LA, MN, NM, and OK.  
([http://www.nationalhealthfreedom.org/InfoCenter/laws\\_passed.html](http://www.nationalhealthfreedom.org/InfoCenter/laws_passed.html))

- Homeopathic remedies are sold over the counter without a prescription in all states and are regulated by the FDA (U.S. Homeopathic Pharmacopeia)

**11. Identification of any health care professions that can reasonably be anticipated to be directly impacted by the request, the nature of the impact and efforts made by the requestor to discuss the request with such health care professions.**

No health care professions are directly impacted by this request, including licensed homeopathic medical doctors and naturopaths.

**12. A description of how the request relates to the health care profession's ability to practice to the full extent of the profession's education and training.**

The current licensing law in Connecticut unduly restricts the practice of homeopathy. Only medical doctors are currently eligible for licensure as homeopaths and naturopaths may practice homeopathy but may not call themselves homeopaths. As a result, well-trained and qualified certified homeopaths are not allowed to provide homeopathy in Connecticut. This does not reflect the situation in much of the rest of the U.S.

Much has changed in homeopathy (as well as medicine) since 1893 when the current licensing law for homeopathic physicians was enacted in Connecticut. At that time, Homeopathic Medical Colleges were popular (20 on the East coast alone) and therefore well-trained homeopaths were medical doctors. This is no longer the case, as homeopathic training no longer exists in medical schools in this country. ***Extending the practice of homeopathy to certified homeopaths would bring Connecticut into the 21<sup>st</sup> century as well as bring it the distinction of having the most progressive and high standards in the country.***

It is important to note that homeopaths and doctors are two distinct professions with very different educations and training requirements. Homeopathy is a discipline unto itself. Regardless of whether a homeopath also has a degree in medicine, nursing, chiropractic, acupuncture or other profession, a homeopath recommends homeopathic remedies and monitors the care and progress of individuals through follow-up visits. This valuable guidance is all a homeopath does. Unlike a medical doctor, a homeopath does not diagnose diseases, administer or dispense legend drugs or controlled substances, engage in surgery or in any practices that invade the human body by puncture of the skin, or set fractures.

Recognition of certified homeopaths assures the public of a high level of competence among practitioners. Allowing more homeopaths to practice in Connecticut allows growth of a system of natural health care that is safe, effective and environmentally sustainable and is recognized throughout the world.

Attachments:

- Letter of Support, Council for Homeopathic Certification
- Council for Homeopathic Certification - Requirements for Certification

## Comparison of Homeopathic Educational Requirements

|                                     | <b>Nationally Certified Homeopaths (CCH)</b>                                                                                                                                                    | CT Homeopathic Medical Doctors (MD)                                                                                    | Naturopathic Physicians (ND)*                                                                                                        |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Number of Required Classroom Hours  | <b>500</b>                                                                                                                                                                                      | 30                                                                                                                     | 144                                                                                                                                  |
| Number of Required Clinical Hours   | <b>390</b>                                                                                                                                                                                      | 90                                                                                                                     | 72<br>if in homeopathic specialty clinic; plus other exposure in naturopathic clinic ad hoc                                          |
| Number of Required Supervised Cases | <b>10</b>                                                                                                                                                                                       | none                                                                                                                   | none                                                                                                                                 |
| Number of Independent Cases         | <b>5</b>                                                                                                                                                                                        | none                                                                                                                   | none                                                                                                                                 |
| Required Medical Education          | <b>Medical Terminology, Anatomy and Physiology, Pathology</b>                                                                                                                                   | Medical Doctor; Requirements of Section 20-10 of the General Statutes                                                  | Doctor of Naturopathy; Requirements of Section 20-34 to 42 of the General Statutes                                                   |
| Exam contents                       | <b>Section I: Philosophy</b><br><br><b>Section II: Human Health Sciences</b><br><br><b>Section III: Materia Medica</b><br><br><b>Section IV: Repertory</b><br><br><b>Section V: Case Taking</b> | Section I:<br>Foundations of Homeopathy<br><br>Section II:<br>Practice of Homeopathy                                   | Comprehensive Board Exam that incorporates Health Sciences and Homeopathy:<br>~Philosophy<br>~Materia Medica<br>~Repertory<br>~Cases |
| Oral Interview                      | <b>YES</b>                                                                                                                                                                                      | NO                                                                                                                     | NO                                                                                                                                   |
| Continuing Education Requirements   | <b>20 hours per year in homeopathy (CHC requirement)</b>                                                                                                                                        | 50 hours every two years in their area(s) of practice (though not specific to homeopathy)<br>(State of CT Requirement) | 15 every year (though not specific to homeopathy)<br>(State of CT requirement)                                                       |

\*per University of Bridgeport Naturopathic School requirements

# HOMEOPATHY for CONNECTICUT

## National Certification Requirements

To become certified as a Certified Classical Homeopath (CCH), the Council for Homeopathic Certification (CHC) requires the following:

### 1. Exam Prerequisites:

- U.S. resident
- Homeopathic education:  
Minimum of 500 hours of homeopathic training from either a single school or a variety of different programs.
- Medical education:  
Completion of an Anatomy and Physiology course (3-5 credits or a minimum of 33 hours of lecture time) and a Pathology and Disease course (40 classroom hours). Courses must be recognized by the CHC.
- Clinical education:  
Minimum of 250 documented hours of clinical observation/ analysis plus 10 formally supervised cases, for a total of 390 hours of clinical experience.

### 2. Proctored written exam: Theoretical and Practical

3. Submission of 5 cases taken without supervision and followed for a minimum of 6 months.

4. Oral interview

5. Practitioners certified by the CHC must complete a minimum of 20 continuing education units (CEU's) each calendar year.

For more, please visit [www.homeopathicdirectory.com](http://www.homeopathicdirectory.com).

# COUNCIL FOR HOMEOPATHIC CERTIFICATION

TOGETHER WE'RE DEFINING THE PROFESSION

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March 2, 2010

Dear Ms. Wolf and Ms. Beale:

The CHC understands that a group of homeopaths and consumers are working together in Connecticut to change the laws to allow the practice of homeopathy by highly qualified homeopaths, specifically those with the CCH designation.

We understand that this model of certification relies on the Council for Homeopathic Certification to set the prerequisite requirements for certification, administer the exam, and communicate with the Connecticut Department of Public Health when needed to verify certification in place of the State of Connecticut setting the standard for professional homeopaths (which costs money and resources they don't have).

The CHC supports Ms. Beale's and Wolf's statement that the standards for the profession of homeopathy "are best set and maintained by the profession itself rather than by state government." As Ms. Beale and Ms. Wolf have noted "this approach has two strong advantages. It allows the standards of practice to evolve with the profession and remain relevant. It also offers a model of regulation for the state that does not require establishing a mechanism for setting standards and administering an exam. Succeeding in this effort would be breaking new ground in the practice of homeopathy in the United States."

While the CHC is solely a certifying body, and does not engage in either PAC or legislative issues, the CHC supports Ms. Beale and Wolf's efforts and proposal to change the Connecticut state law to allow homeopaths who have achieved the distinction of Certified Classical Homeopath (CCH) to fully practice homeopathy and call themselves Homeopaths.

Sincerely,

Jacki Fox  
Executive Director