



Jennifer L. Filippone, Chief
Practitioner Licensing and Investigation Section
Department of Public Health
410 Capitol Ave
Hartford, CT 06134
August 15 2012

To: Jennifer L. Filippone, Chief, Practitioner Licensing and Investigation Section
From: Connecticut Naturopathic Physicians Association

Dear Ms. Filippone,

On behalf of the Naturopathic Physicians practicing in the state of Connecticut the Connecticut Naturopathic Physicians Association (CNPA) is requesting a scope change for 2013.

This scope change being requested would:

- 1.) include Prescription rights for all schedule I through V pharmaceuticals.
- 2.) include all methods of delivery including injection and IV
- 3.) change designation of ND to NMD for Naturopathic Medical Doctor (NMD)
- 4.) added CE's required for pharmaceutical prescriptive rights

The following pages will cover the items requested by the Department of Public Health that would justify and explain the reasons for this scope change request.

As there are changing members on the committees and we probably have not introduced Naturopathic Medicine to everyone, there is a need to make some clarifications about ND's before you begin your review. There are a number of links in this document so that those who need more information can link and those who are knowledgeable in the particular area won't have to read through it.

from the American Association of Naturopathic Medicine (AANP)
<http://www.naturopathic.org/>



About Naturopathic Medicine

The past 30 years has seen an extraordinary increase in consumer demand for safe, effective and cost-effective natural health care. Naturopathic medicine has emerged as the health-care profession best suited to meet this demand. Although it almost disappeared in the mid-twentieth century because of the popularity of drugs and surgery, naturopathic medicine now offers safe, effective natural therapies as a vital part of the health-care systems of North America in the twenty-first century.

Naturopathic physicians are trained in the art and science of natural health care at accredited medical colleges. Integrative partnerships between conventional medical doctors and licensed NDs are becoming more available. This cooperation makes more effective therapies available to consumers. It increases patient satisfaction in their relationships with their care providers. More people are recovering their health by adding naturopathic medicine to their health-care options.

You may be wondering why the practice of Naturopathic Medicine is not done everywhere to the extent that western medicine is. It is because the profession of naturopathy along with those of acupuncture, homeopathy, botanical medicine, etc. although thousands of years old, do not generate the amount of profit and revenue that modern medicine does. This does not mean that they are ineffective healthcare options. They are all very effective and cost effective. Practitioners of these medicines do not go to medical school because they think they will become wealthy if they practice an alternative medicine. The average age of students in the Naturopathic Medical School in 2003 was 35 years old. These are people who find Naturopathic Medicine and are compelled to change careers to become an ND to help patients reach better health. Naturopathic Doctors (ND) attend medical school for the true nature of what treating patients is all about: using the least invasive therapy first and foremost to do no harm, and when necessary utilize the methods of modern medicine, drugs and surgery, when there is no other option. It is unfortunate that at this point in our history the doctors who can often help patients avoid the more invasive therapies are mostly sought when the patient is seeking a last resort.

ND's need this scope change to more effectively treat patients who seek their help and be allowed to utilize this part of their education. The use of pharmaceuticals allows ND's to have more options when needed and to decrease meds as the patients health improves. You will find that more and more MD's are beginning to use many of the modalities that the Naturopathic Physicians use. There are more and more health seminars to teach MD's about the merits of preventative medicine, medical detoxification, and weight loss strategies for patients etc. You have to ask yourself, if the methods the ND's have used for years don't work then why are so many MD's beginning to use the same methods?

What many MD's have not noticed is that there is a medical profession that is all about prevention and is practicing in every state in the US. The profession of naturopathic medicine has continued to use and treat with the effective modalities that have come down through time because they are effective and have added the



newer modalities when the least invasive don't work. In order for this profession to treat the public more effectively, they need to be able to use all the medical modalities they are trained in. For clarification it is important to inform you before the review of the following document that there is also a profession of Naturopathic practitioners that may or may not refer to themselves as doctors but practice Naturopathy in what is often called a traditional form. Many of the schools who train the traditional naturopaths are correspondence schools. These Naturopathic Practitioners are not medically trained and do not qualify for licensing in any state. They are not allowed to practice in Connecticut or call themselves Naturopathic Doctors (ND's) here. One of their national associations: American Naturopathic Medical Association <http://www.anma.org/> has been referenced in a previous ND's scope change request as being opposed to ND's having prescription rights. As the education and practice of the members of this association is far different from that of medically trained physicians and as they cannot practice in Connecticut, their opposition to prescribing does not represent colleagues who oppose this scope change. More information will be provided under professions who may oppose this legislation.

Thank you for your time and consideration of this scope change request.

Please contact me if you have any questions on this proposal.

Dr. Ann Aresco

ProNatural Physicians Group LLC, email: ProNaturalPhysicians @comcast.net



August 15 2012

1) a plain language description of the request:

This proposal seeks to give Naturopathic Doctors the ability to:

- Have prescription rights for schedules 1-5 and DEA licensing
- use all forms of administration including injection, IV as well as all other medical delivery forms.
- Added 10 CE for pharmaceuticals per year added to the current CE 15 general CE for those ND's with DEA licenses

Updated training for ND's who have been practicing without prescribing will be available from the State's Naturopathic Medical College in Bridgeport. New graduates will be up-to-date without this additional training.

The Naturopathic College will also offer an annual Pharmaceutical CE program for all ND's

(note that the New Hampshire Association for Naturopathic Physicians provides these CEs already for ND's in the New England states who already prescribe)

- Designation of ND to NMD for clarification of the medical training of licensed Naturopathic physicians.

There are Naturopaths who have trained in non medical schools that are often confused with the medically trained ND's. In that the medically trained ND's are educate more closely to an MD's training, it would clarify this with an NMD designation rather than the traditional ND designation that can be confusing to the general public. Naturopathic practitioners whose education is for the most part from a correspondence school cannot practice legally in CT.

In the next pages you will see that the medical ND's requesting this change are educated and trained to practice with such a scope. There are a number of states where ND's currently practice to their full scope including minor surgery. In New England this includes Maine, Vermont and New Hampshire.



2) public health and safety benefits that requestor believes will occur if the request is implemented and, if applicable, a description of any harm to public health and safety if it is not implemented.

These changes will enhance preventative care and result in enhanced care for patients. Currently, a Naturopathic Physician can see a patient, diagnose a vitamin or nutritional deficiency in the patient, but is unable to render treatment in Connecticut if there is the need for a pharmaceutical or injection or IV. This proposal would permit ND's in CT to practice closer to their full scope and administer appropriate dosages of natural substances and pharmaceuticals to patients.

Public Health and safety benefits:

ND's are trained in Neutraceuticals and Pharmaceuticals and therefore more aware of the possible interactions of these medicines.

ND's would be able to advise a patient on prescriptions rather than having to refer the patient back to the prescriber in instances where a prescription should be altered for the patients' safety.

Patients could be seeing one practitioner for both types of prescriptions.

Given the risks associated with the prescription medication ND's use, our practitioners generally utilize them as a last resort to minimize adverse consequences.

MD's are increasingly utilizing more Neutraceuticals in their practices. As this is not part of their medical education (see education section) it is safer for the patient to see the doctors who are trained in the use of the over the counter medicines along with the pharmaceuticals.

MD's and other health care practitioners are currently misinformed about the practices and training of Naturopathic Doctors. This unfortunately leads to the invalid information being passed to patients who could benefit from the treatments offered by naturopathic doctors. This also leads in some instances to the patients dismissing their MD's or APRN's etc. due to their reluctance to treat patients who are also being treated by a naturopathic physician. Patients then need to seek someone who will work with them and continue their prescriptions. ND's with prescription rights can help these patients.

You will see in the educational part of this request that ND's are well educated and more than qualified to diagnose and treat patients using natural and pharmaceutical remedies. It should also be noted that most of the patients seen today by Naturopathic Physicians are those patients who have tried all other routes of health care without success. These patients come seeking help with conditions that have either not been successfully treated, or diagnosed, or the patient is seeking treatment other than that already offered by the medical doctors. Malpractice rates for ND's in states that practice full scope are the same as rates in states that do not



have full scope and remains an incredibly low premium (approx \$4000.00) per year with that compared to other doctors. Public risk would be a primary factor in these companies determining premium rates.

3) the impact of the request on public access to health care

This will enhance access to care only slightly. Patients will now be able to see a wider range of providers who can treat them for preventative care, nutraceutical treatment and pharmaceutical treatments. This law change could eliminate duplicate medical appointments; one to the ND for the diagnosis, the other to the MD for prescriptions of those patients who choose to use both forms of treatment. It should be noted that the number of patients this would affect is only related to those patients who would seek medical services from Naturopathic Physicians. The impact for those who choose to see Naturopathic Physicians would be an increased access to health care. The overall access to health care in CT will remain as it is today.

4) a brief summary of state or federal laws governing the profession:

- Naturopathic Doctors are primarily regulated at the state level. In Connecticut we have been licensed since 1922. Only Oregon has a law that is older than that of Connecticut. Oregon ND's practice their full scope. The licensed states:
 - Alaska
 - Arizona
 - California
 - Connecticut
 - District of Columbia
 - Hawaii
 - Idaho
 - Kansas
 - Maine
 - Minnesota
 - Montana
 - New Hampshire
 - North Dakota
 - Oregon
 - Utah
 - Vermont
 - Washington
 - United States Territories: Puerto Rico and Virgin Islands

There are a number of states currently seeking licensing and or increase to their scope of practice.

In New England Maine, New Hampshire and Vermont are licensed and have prescription rights. Massachusetts and New York have been proposing licensing legislation for a number of years and both were very close to passing this year.

5) the states current regulatory oversight of the profession



In Connecticut we also have a State Board of Natureopathic Examiners: Said board shall (1) hear and decide matters concerning suspension or revocation of licensure, (2) adjudicate complaints against practitioners and (3) impose sanctions where appropriate.

A review of the Public Health Departments records shows no incidents of improprieties related to ND's for 2010 and 2011. We did not go back any further and are confident that the reporting on others years would be much the same.

Although not a regulatory entity it should be noted that malpractice rates for ND's in states that practice full scope are the same as rates in states that do not have full scope and remains an incredibly low premium (approx \$4000.00) per year when compared to other doctors. Public risk would be a primary factor in these companies determining premium rates. Those issues that are regulated by the exam boards would inevitably be the same issues that would cause increases in malpractice.

6) all current education training and examination requirements and any relevant certification requirements applicable to the profession:

In order to be licensed to practice in any state Naturopathic doctors need to have graduated from an accredited naturopathic medical school, have successfully completed both the basic sciences (part I) and clinical sciences examination (PART II) of the Naturopathic Physicians licensing examination (NPLEX), and completed the Connecticut jurisprudence examination for naturopathic physicians.

Please see the attached diagram of of ND, MD, APRN and PA education and or licensing information. Three of these professions have prescription rights in CT.

National board Examinations of ND's:

The NPLEX Part I - Biomedical Science Examination is an integrated, case-based examination that covers the topics of anatomy, physiology, biochemistry & genetics, microbiology & immunology, and pathology.

The NPLEX Part II - Core Clinical Science Examination is an integrated, case-based examination that covers the topics of diagnosis (using physical & clinical methods and lab tests & imaging studies), materia medica (botanical medicine and homeopathy), other treatment modalities (nutrition, physical medicine, health psychology, and research), and medical interventions (emergency medicine, medical procedures, public health, and pharmacology). This examination is designed to test the skills and knowledge that an entry-level naturopathic physician must have in order to practice safely.



Note that there is an examination process completed by the ND schools of physical exams, medical history, and prescribing that is required before the student can pass into the clinical settings. ND students are required to be in the clinical setting during the final 2 years of medical school and prior to the NPLEX Part II can be taken.

Every jurisdiction that licenses/registers naturopathic physicians requires that you pass the NPLEX Part II - Core Clinical Science Examination. The NPLEX Part II - Clinical Elective Examinations (Minor Surgery and Acupuncture) may also be required for eligibility to become licensed to practice as a naturopathic physician in some jurisdictions.

National Medical board exams:

USMLE 1:

Sections focusing on individual organ systems are subdivided according to normal and abnormal processes, principles of therapy, and psychosocial, cultural, and environmental considerations. Each examination covers content related to the traditionally defined disciplines of anatomy, behavioral sciences, biochemistry, microbiology, pathology, pharmacology, and physiology, as well as to interdisciplinary areas including genetics, aging, immunology, nutrition, and molecular and cell biology.

USMLE 2: patient encounters under examination

USMLE 3: History & Physical Examination, Laboratory & Diagnostic Studies, Diagnosis, Prognosis, Managing Patients, Health Maintenance, Clinical Intervention, Clinical Therapeutics, Legal & Ethical Issues, Applying Basic Concepts.

Although it is a little difficult to see a comparison the 2 professional board exams, you can see that the ND's are tested more vigorously in the preventative/chronic disease and least invasive therapies and the MD's are tested more vigorously in the intervention and emergency medical areas.

Links to naturopathic medical schools in the US and Canada:

- ▶ [Bastyr University](#)
- ▶ [Boucher Institute of Naturopathic Medicine](#)
- ▶ [Canadian College of Naturopathic Medicine](#)
 - ▶ [National College of Natural Medicine](#)
 - ▶ [National University of Health Sciences](#)
- ▶ [Southwest College of Naturopathic Medicine](#)
 - ▶ [University of Bridgeport](#)

For clarification there is also a profession of Naturopathic practitioners that may or may not refer to themselves as doctors but practice Naturopathy in what is often called a traditional form. Many of the



schools who train the traditional naturopaths are correspondence schools. These Naturopathic Practitioners are not medically trained and do not qualify for licensing in any state. They are not allowed to practice in Connecticut or call themselves Naturopathic Doctors(ND's) here. They are in no way included in this request for rights to prescribe.

However due to this group of practitioners being referred to in a previous legislative effort for the ND's in this state we are also requesting to have a designation of Naturopathic Medical Doctor (NMD) for the medically qualified Naturopathic Physicians in CT. This should help to clarify the advanced medical education of the Naturopathic Physicians in the state.

7) a summary of known scope of practice changes requested or enacted concerning the profession in the five years preceding the request:

The Connecticut Naturopathic Physicians Association advocated for passage in 2007 of a continuing education law. This was enacted and ND's in Connecticut must complete 15 CE's prior to renewing their licenses every year.

The Connecticut Naturopathic Physicians Association advocated for passage in 2012 of a scope change which sought to give the ND's the ability to use nutrients by all forms of administration. As B-12 injections would have been part of the scope change requested it did not pass due to the lack of the ND's ability to legally prescribe the injection form of B-12. This years request for a scope change to prescription rights and all forms of delivery administration would resolve the issue stopping last year's passage for scope change.

8) the extent to which the request directly affects existing relationships within the health care delivery system:

This proposal will simply add Naturopathic Doctors to the list of providers who currently prescribe pharmaceuticals including those who are not required to have a doctorate in medicine to prescribe such as Physician Assistants and Nurse Practitioners.

The ability to use additional forms of administration of nutrients will increase the access of IV and injection of nutrients for the general public. Since very few medical practitioners are currently using this method of treatment, there would be no affect on the existing relations ships with in the health care delivery system.

The change of the designation ND change to NMD will help other medical practitioners to better recognize the qualified Naturopathic doctors.



9. the anticipated economic impact of the requestor on the health care delivery system:

Naturopathic Doctors treat patients via prevention and correcting the underlying problems, such as nutrient deficiencies which is a very cost effective approach. Use of delivery systems such as injection and IV of nutrients can decrease use of pharmaceutical medications saving money, both for patients and insurance companies. Since very few practitioners are currently using this method of treatment currently it is difficult to forecast what the economic impact would be. Since insurance usually doesn't cover nutrients for patients the added cost, which is minimal, would be paid by the patients. The savings of the pharmaceutical would benefit the insurance companies or the patient are without insurance.

Impact of allowing the ND's to prescribe would also be lower cost to the patient and the insurance companies. Primarily preventative practitioners, ND care will have fewer pharmaceuticals as the other modalities, and correcting the cause of health issues are the first choices. Prescriptions by ND's are also viewed as temporary treatment until the patients health improves and health issues are resolved. Because ND's practice differently than MD's, prescriptions would not be the focus of the treatment options, but an additional treatment to be used as a last resort.

There is decreased future cost for those who effectively work with ND's to resolve the core causes of their diseases and no longer are reliant on the medical system to take care of their health care issue.

There are studies coming out everyday showing the cost effectiveness of using alternative medicines. A few of these are:

Is complementary and alternative medicine (CAM) cost-effective? a systematic review

<http://www.biomedcentral.com/1472-6882/5/11>

Study Points to Cost-Effectiveness of Naturopathic Care for Low-Back Pain

<http://nccam.nih.gov/research/results/spotlight/070708.htm>

Recent Studies Show That Access to Full Spectrum of Healthcare Professionals Key to Cost-Effective Care

Health services delivered by a variety of health professionals save money, broaden patient options

WASHINGTON – Several recent studies have demonstrated that cost effectiveness for healthcare improves when health services are provided by licensed professionals other than MDs or DOs. Evidence also shows that there is no loss in quality or effectiveness of care.

By Coalition for Patients' Rights

In the current system patients are seeing MD's for pharmaceuticals and ND's for supplements and preventative care doubling the cost of treating one condition. Additionally if the ND's has prescription rights, and the patient



has corrected the health condition, the ND can help the patient diminish the pharmaceuticals necessary. Additionally the possibility of interactions between prescriptions and supplements will likely be avoided as the ND's are trained in both types of medication.

Future impact of the Affordable Care Act on the medical system is expected to be increased patients in the medical system and not enough doctors to take care of them. Allowing the ND's to have prescription rights puts more doctors in the system that can treat patients with pharmaceuticals. It will also decrease the patient visits for those patients who need pharmaceuticals and want to see an ND.

10) regional and national trends in licensing of the health profession making the request and a summary of relevant scope of practice provisions enacted in other states:

At least 11 of the 16 states that are licensed for Naturopathic doctors, allow IV or IM injections, including New Hampshire, Maine and Vermont. None of the licensed states restrict non-injection use of nutrients by any other route of administration. Naturopathic medical education includes training in the application of IV, IM and other routes of administration of nutrients. The number of states that currently have full prescription rights include all the states that have Naturopathic Medical schools except for Connecticut.

Maine, Vermont and New Hampshire have full prescription rights and 2 of the 3 also allow minor surgery. New York and Massachusetts have been requesting a licensing law for many years and have been unable to get it through the political quagmire and into law, even though all the surrounding states have licensing and most have full scope licensing.

This year New Hampshire passed a bill to have Naturopathic Doctors covered by all insurance companies.

Vermont passed a bill to have ND's included in Medical Homes.

ND's practicing in unlicensed states have a license for one of the closest licensing states so patients understand the credentials the ND has, even if they are practicing in an unlicensed state. The biggest issue in these types of states is that the insurance companies will not cover the patients' visits for naturopathic doctors. Access to the most fully trained preventative medical doctors is then restricted to those who can afford to pay out of pocket. The entity that loses the most money in these areas is the insurance companies because patients who have insurance coverage, but can't afford to pay out of pocket for preventative care, will continue to need more care from the health care system the insurance covers. Using pharmaceuticals and surgery as the only treatment option, generally leads to more pharmaceuticals and surgeries.

11) identification of any health care professionals that can reasonably be anticipated to be directly affected by the request, the nature of the impact, and efforts made by the requestor to discuss it with such health care professions:



We don't anticipate any major effect on other health care professions. Medical doctors may provide B12 injections and a small number of physicians or APRN's with holistic medical focus may provide nutrient IV's. Naturopathic doctors are fairly unique in their training and ability to provide low-cost patient care using nutrients and other natural substances including pharmaceuticals.

Patients don't come to ND's for pharmaceuticals but if the ND can provide it would be useful for the patient to be able to get what they need from one doctor.

MD's (Connecticut State Medical Society - CSMS) have recently endorsed the PA's request for less supervision while prescribing. This endorsement of a profession that is far less trained to prescribe than the Naturopathic Physicians would indicate that MD's do not have a problem with medically trained, Licensed Physicians prescribing.

The future impact of the Affordable Care Act on the medical system is expected to be increased by 31 million patients in the medical system and not enough doctors to take care of them. Allowing the ND's to having prescription rights puts more doctors in the system that can treat patients with pharmaceuticals. It will also decrease the patient visits for those patients who need pharmaceuticals and want to see an ND.

The impact to any health profession would be a decrease in the number of visits a patient would need to have. With over 10,000 and possibly as much as 15,000 medical doctors, DO's, and surgeons in CT, it would be highly unlikely that the added 250 ND's with prescription rights could have an impact on their professions.

The CNPA has reached out to relevant groups and look forward to discussing this with them further. We would also be willing to meet with any professional association that has determined that there will be an impact on their profession that we failed to see, for discussion of same.

12) a description of how the requests related to the health care professional ability to practice to the full extent of the professions education and training.

Naturopathic doctors are trained in the administration of IV, IM and subcutaneous injections, as well as the application of nutrients for certain conditions, safety considerations, and nutrient interactions. In our clinical training and practice (where allowed) we routinely employ nutrients by IV and other methods of administration for various conditions. This proposal will enhance our ability to practice closer to the extent of our education and training.

Prescription rights will allow us to be closer to our full scope but it is not the full scope of training for ND's. The diagram below is a description of the full scope of training for ND's in medical school and highlights what we would have with prescriptive rights:



Pharmacology, Lab diagnosis, Neurosciences, Clinical physical diagnosis, Genetics, Pharmacognosy, Biostatistics, Epidemiology, Public Health, History and philosophy, Ethics, and other coursework, Dermatology, Family Medicine, Psychiatry, Medicine, Radiology, Pediatrics, Obstetrics, Gynecology, Neurology, Surgery, Ophthalmology, Botanical medicine, Homeopathy, Oriental medicine, Hydrotherapy, Naturopathic manipulative therapy, Ayurvedic medicine, Naturopathic Case Analysis/Management, Naturopathic Philosophy, Advanced Naturopathic Therapeutics.

The increased scope for pharmaceuticals and all methods of administration for drugs and nutrients will help to streamline the treatment of certain patients who required injections as part of their treatment while providing safe, cost-effective, and underutilized treatment options for patients with various acute and chronic conditions.

Southwest College of Naturopathic Medicine & Health Sciences	Bastyr Naturopathic Medical School	Yale University	Johns Hopkins	Medical College of Wisconsin	Advanced Nurse Practitioner	Physician Assistant
Federally & Regionally Accredited Naturopathic Medical School	Federally & Regionally Accredited Naturopathic Medical School	Federally & Regionally Accredited Conventional Medical School	Federally & Regionally Accredited Conventional Medical School	Federally & Regionally Accredited Conventional Medical School	30 hours of Pharmacology needed to obtain license in Connecticut	60 hours of Pharmacology needed to obtain license in Connecticut
Basic and Clinical Sciences:						
Anatomy, Cell biology, Physiology, Histology, Pathology, Biochemistry, Pharmacology, Lab diagnosis, Neurosciences, Clinical physical diagnosis, Genetics, Pharmacognosy, Biostatistics, Epidemiology, Public Health, History and philosophy, Ethics, and other coursework.						
1626 84 hrs pharmacology included	1639	1420	1771	1363		
Clerkships and Allopathic Therapeutics:						
including lecture and clinical instruction in Dermatology, Family Medicine, Psychiatry, Medicine, Radiology, Pediatrics, Obstetrics, Gynecology, Neurology, Surgery, Ophthalmology, and clinical electives.						
1784	1925	2891(+thesis)	3391	2311		
Naturopathic Therapeutics:						
Including Botanical medicine, Homeopathy, Oriental medicine, Hydrotherapy, Naturopathic manipulative therapy, Ayurvedic medicine, Naturopathic Case Analysis/Management,						
780	633	0	0	0		
Therapeutic Nutrition						
120	132	0	0	0		
TRAINING						
4464	4472	4311+thesis	5162	3674	30 hours of Pharmacology needed to obtain license in Connecticut	60 hours of Pharmacology needed to obtain license in Connecticut

Subjects studied and Average hours of Study

Basic And Clinical Sciences (see comparison for description)

- Naturopathic Physicians - 1500 hours
- Conventional Physicians - 1500 hours

Clerkships and Allopathic Therapeutics (see comparison for description)

- Naturopathic Physicians - 2000 hours
- Conventional Physicians - 3000 hours

Naturopathic Medicine (see comparison for description)

- Naturopathic Physicians - 1000 hours
- Conventional Physicians - 0 hours