

The Society for Science Based Medicine

[www.sfsbm.org](http://www.sfsbm.org)

***Comments to the Pennsylvania State Board of Medicine’s Committees on Allied Health Professionals, Legislation/Professional Liability and Continuous Professional Development Regarding the Regulation of Naturopathic Doctors***

The Society for Science-Based Medicine (SfSBM) appreciates the opportunity to assist the Pennsylvania State Board of Medicine (Board) in the important task of promulgating regulations governing the practice of naturopathy pursuant to the Pennsylvania Naturopathic Doctors Registration Act of 2016.

***Introduction***

The Society for Science-Based Medicine is a 501(c)(3) non-profit devoted to supporting a

single, science-based standard of care for all health care. We believe that effective, reliable care can only be delivered within a consistent framework of scientific knowledge and standards.

Our mission is to educate consumers, professionals, and policymakers about science-based medicine. We support sound consumer health care laws and oppose legislation that undermines science-based medicine. (A list the Board of Directors follows these Comments.)

Unfortunately, naturopathic medicine operates outside of the framework of scientific knowledge and standards. Naturopathic doctors claim they use therapeutic methods and substances that encourage individuals’ “inherent self-healing process,” a process they have yet to describe in scientifically plausible terms. Yet, naturopathic doctors also claim that their methods are [superior to those of conventional medicine](http://www.doylestownnaturalmedicine.com/natural_medicine/natural_cold_remedies/). According to the [Pennsylvania Association of Naturopathic Physicians](http://panaturopathic.org/about/):

“Unlike other contemporary health care practitioners, naturopathic doctors focus on the underlying cause of patient illness, rather than treating only the physical symptoms.”

Because they fail to adhere to any science- or evidence-based standard of care, naturopathic medicine is rife with unvalidated diagnostic testing, bogus conditions, and unproven and disproven treatments. In addition, their education and training is insufficient to safely diagnose and treat the undifferentiated patient.

We agree with the [Recommendation of the American Academy of Family Physicians](https://www.aafp.org/dam/AAFP/documents/advocacy/workforce/scope/Naturopathic.pdf):

“The American Academy of Family Physicians (AAFP) believes that naturopathic theory and practice are not based upon the body of knowledge related to health, disease, and health care that has been accepted widely by the scientific community. The scope and quality of naturopathic education does not prepare naturopathic practitioners to properly and accurately diagnose or provide appropriate treatment. In states that license naturopaths, the AAFP opposes an expansion of naturopaths’ scope of practice. The AAFP believes that naturopathic education and training do not prepare naturopaths to safely or effectively prescribe medications, perform physicals for school or employment, or perform surgical procedures. A naturopath must not be allowed, under any circumstances, to use the title ‘physician,’ nor should a naturopath ever be considered a ‘primary care physician.’”

We urge the Board to read the entire AAFP Report prior to promulgating the regulations.

***Naturopathic Education and Training***

Britt Hermes, a former licensed naturopathic doctor and graduate of Bastyr University’s naturopathic program, has described the inadequacies of naturopathic education and training. SfSBM highly recommends her analysis: The [Naturopathic Students Guide](https://www.naturopathicdiaries.com/students-guide-naturopathic-school/). Basically, naturopathic students spend too much of their classroom time learning pseudoscience like homeopathy and unproven treatments for disease like dietary supplements, colonics and botanicals. The majority do not do internships or residencies and clinical education is limited to that received in their 4-year program, time spent primarily at school-based clinics where they see patients from a limited demographic presenting with a narrow range of conditions. The AAFP Report provides a valuable comparison chart graphically demonstrating some of these points. In addition, we recommend that the Board review the Committee on the Practice of Naturopathy Report, which can be accessed from the Connecticut State Department of Health [website](http://portal.ct.gov/DPH/Practitioner-Licensing--Investigations/Scope-of-Practice-Determinations-for-Health-Professions/Past-Scope-of-Practice-Requests-and-Reports). While the Connecticut Report is focused on prescribing privileges, it provides illuminating information on naturopathic education.

***Naturopathic Practice***

Naturopathic practice is filled with dubious diagnostic tests (like [IGg “food intolerance” testing](https://sciencebasedmedicine.org/naturopathy-vs-science-allergy-edition/)), fabricated conditions (like “[adrenal fatigue](https://www.medicalnewstoday.com/articles/245810.php)” and “[chronic candidiasis](https://sciencebasedmedicine.org/candida-and-fake-illnesses/)”) and unproven, or disproven, remedies (like [homeopathy](https://nccih.nih.gov/health/homeopathy) and “[detoxification](https://sciencebasedpharmacy.wordpress.com/2013/01/04/the-detox-delusion/)”). Some of these are catalogued in Ms. Hermes’s [Guide to Naturopathic Medicine](https://www.naturopathicdiaries.com/patients-guide-naturopathic-medicine/) and further described in her [Legislative Guide](https://www.naturopathicdiaries.com/legislation-guide-naturopathic-medicine/), as well as her posts on [Naturopathic Diaries](https://www.naturopathicdiaries.com/). In addition to the dangers of their practices, naturopathic doctors’ [recommendations can conflict](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3854814/) with evidence-based diagnoses and treatment advice given by physicians, complicating patient care.

A review of the therapies advertised on the websites of clinics offering naturopathic treatments does not support the proposition that naturopathic medicine is a science and evidence-based practice.

Naturopathic advertisements can mislead the public. A [review of the therapies advertised on the websites of clinics offering naturopathic treatments](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3182944/) does not support the proposition that naturopathic medicine is a science and evidence-based practice and [many offerings are unproven](https://www.ncbi.nlm.nih.gov/pubmed/27986744).

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Naturopathic doctors are [traditionally anti-vaccination](https://sciencebasedmedicine.org/naturopathy-vs-science-vaccination-edition/), although this ideology is sometimes obfuscated by terms like parental “informed choices” and promotion of “vaccination safety.” This opposition is well documented in the medical literature:

* [Children were significantly less likely](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2924961/) to receive each of the four recommended vaccinations if they saw a naturopathic doctor. Children aged 1–17 years were significantly more likely to be diagnosed with a vaccine-preventable disease if they received naturopathic care.
* [A survey of Massachusetts naturopaths and homeopaths found that most did not recommend vaccination.](https://www.ncbi.nlm.nih.gov/pubmed/10632255)
* [A survey of children’s records from an Ontario naturopathic clinic identified 8.9% of children had not been vaccinated.](http://pediatrics.aappublications.org/content/115/3/e338.short)
* [Consultation with a naturopath](http://pediatrics.aappublications.org/content/117/5/1532) was associated with anti-vaccination attitudes among mothers of pediatric patients.
* [Consultation with a naturopath](https://www.ncbi.nlm.nih.gov/pubmed/20364531) was found to have an independent inverse association with annual flu shots among women in contact with young children.

This ideology appears to originate with the naturopathic schools themselves, where [anti-vaccination attitudes increase](https://www.ncbi.nlm.nih.gov/pubmed/18674581) over the 4 years of school:

* [Surveys of students attending the Council on Naturopathic Medical Education(CNME)-accredited Canadian College of Naturopathic Medicine](https://www.ncbi.nlm.nih.gov/m/pubmed/14670313/) found that only 12.8% of the respondents would advise parents that their children receive all recommended vaccinations and that anti-vaccination attitudes increased in the last two years of school.

* [A survey of the CNME-accredited National College of Natural Medicine](https://www.researchgate.net/profile/Mohamed_Khalil32/publication/303428098_Community_Attitudes_Towards_Cupping_Regulations_in_Saudi_Arabia/links/59704e4ba6fdccc6c96c2131/Community-Attitudes-Towards-Cupping-Regulations-in-Saudi-Arabia.pdf) students found that only 26% planned on regularly advising vaccinations for their patients and 96% would recommend a schedule different from the standard CDC-ACIP schedule. (Oral Abstract 08.02)

Two recent examples, one from the Pennsylvania Association of Naturopathic Physicians and one from the American Association of Naturopathic Physicians, illustrate naturopathic use of unproven and potentially dangerous treatments as well as their giving substandard health advice based on the use of unvalidated testing, their rejection of evidence-based medicine, and failure to keep up with the medical literature.

First, a current article on the website of the Pennsylvania Association of Naturopathic Physicians (PANP), “[MTHFR and Methylation – what’s the hype?”](http://panaturopathic.org/mthfr-and-methylation-whats-the-hype/)  states that:[[1]](#footnote-1)

“Regulating your body’s methylation process and maintaining healthy MTHFR function can all be accomplished with the right meal and supplement plan for your body. I use the Opus 23 program to pinpoint different mutations specific to your body, and seek to modulate them with natural scientifically-proven substances. The Opus program also tells you what foods are most beneficial for you, and what foods you should avoid based on your specific test results.”

Opus 23 was developed by a team of naturopaths headed by Peter D’Adamo, ND, who is on the faculty of two accredited naturopathic schools. [Opus 23, according to D’Adamo](http://datapunk.net/opus23blog/about_opus23/),

“allows the clinician to import raw genomic data (such as provided by 23andMe and other services) and perform a series of extraordinarily sophisticated analytics upon it, culminating in a fully annotated and curated client report.”

These reports are used to recommend and sell dietary supplements to patients based on supposed relationships between the patient’s test results and nutritional needs. Opus 23 also purports to identify “over 350 potential adverse drug reactions based on your client’s genotype.”

In fact, this type of genetic testing has never been validated and is not endorsed by any responsible medical authority. Actually, [genetics experts warn *against*](https://www.forbes.com/sites/brittmariehermes/2016/11/14/genetic-sequence-exploited-supplement-industry/#48fec7aa2e67) this sort of testing and making recommendations based on the results. Yet using Opus 23 in testing patients and making clinical decisions based on the results is endorsed in the PANP article.

In addition to getting a plug for Opus 23 on the PANP website, D’Adamo was the featured speaker at the [2017 PANP conference](http://panaturopathic.org/panp-conference-agenda/), on the topic “Eat Right for Your Type,” a reference to his [book of the same name](http://www.4yourtype.com/eat-right-for-your-type-book/), which promotes the idea that an ideal personal diet can be based on one’s blood type. Blood-type diets in general and D’Adamo’s “Eat Right for Your Type” in particular were thoroughly debunked in a [2013 article in the *American Journal of Clinical Nutrition*](http://ajcn.nutrition.org/content/98/1/99.long).

Second, the American Association of Naturopathic Physicians and the Institute for Natural Medicine put out a press release in January of this year touting “FAQs” about naturopathic treatment of cervical dysplasia and HPV with “natural” substances. While emphasizing the “risks and complications” of conventional medical treatment for cervical dysplasia, the AANP promotes the use of

“Vaginal suppositories consisting of green tea and/or curcumin, which draw infection out of the cervical cells and boost the immune system.”

These claims are implausible and the recommended treatments are unproven. More disturbingly, the FAQs recommend

“Escharotic treatment, which uses natural enzymes and herbal solutions to remove abnormal, damaged tissue and stimulate the regrowth of normal tissue.”

The use of [escharotic agents in the treatment of cervical dysplasia is unproven](https://sciencebasedmedicine.org/escharotic-treatment-for-cervical-dysplasia-a-new-incarnation-of-black-salve/) and, when [botanical ingredients like Sanguinaria (bloodroot) are employed](https://www.naturopathicdiaries.com/dont-let-naturopath-near-vagina-black-salve-cervical-dysplasia/), dangerous and in violation of the FDA’s ban on the use of Sanguinaria in compounded drugs.

***Suggested Regulations***

The constitutional basis of the state’s (and therefore the Board’s) authority to regulate healthcare providers lies in its police power, that is, the state’s duty to protect the health, safety and welfare of the public. Given the above information, it is incumbent upon the Board to insure the public is protected from naturopathic practices that are inimical to the public’s health, safety and welfare.

The Pennsylvania Naturopathic Doctor Registration Act does not specify a scope of practice for naturopathic medicine, although it is noteworthy that a bill giving naturopathic doctors a broad scope of practice was specifically rejected by the General Assembly in favor of a law that simply allows naturopathic doctors to register with the state, entitling them to practice “naturopathic medicine.”

The new law specifically prohibits “making misleading, deceptive, untrue or fraudulent representations in the practice of naturopathic medicine” as well as presenting “immediate and clear danger to public health or safety.” The Board is also given the authority to “promulgate regulations that define the accepted standard of care” for naturopathic doctors, presumably overriding their self-defined standard of care, which is [not evidence-based](https://www.naturopathicdiaries.com/wp-content/uploads/2015/01/2018_key_legislative_points_hermes.pdf). Other than that, the registration act gives the Board broad authority to “promulgate regulations that are consistent with the intent of this act.”

Given the wide discretion afforded the Board by the General Assembly in promulgating regulations for naturopathic practice, and the Board’s duty to protect the public health and safety, the Society for Science-Based Medicine suggests the following be included in the regulations. Where indicated in brackets, similar provisions are in effect in other states which regulate the practice of naturopathy.

1. Prohibit naturopathic doctors from calling themselves “physicians” or from claiming they practice “primary care.” Prior to initiating treatment, require the naturopathic doctor and patient to sign a disclosure statement stating that Pennsylvania does not recognize naturopathic doctors as primary care providers and that they are not responsible for the overall care of patients, that naturopathic care is intended only as an adjunct to, and not a substitute for, medical care, and that patients should have a primary care provider and have all specialty care provided by a properly credentialed physician specialist. Naturopathic doctors should be required to coordinate patient care with physicians and other health care providers and refer patients to and consult with physicians and other health care providers as needed. [R.I. Gen. Laws Sec. 5-36.1-18; Md. Code Ann. Sec. 14-5F-12]
2. Require disclosure that naturopathic doctors are not licensed to prescribe drugs or to advise patients regarding prescription drugs (including vaccines) beyond possible dietary supplement/herb-drug interactions and that all questions regarding prescription medications should be directed to the prescriber, the patient’s primary care provider or a licensed pharmacist. [R.I. Gen. Laws Sec. 5-36.1-18]
3. Require, as a condition of registration, that naturopathic doctors have a written collaboration and consultation agreement with a licensed physician, which must include the following: the name and license number of the physician, a statement that the naturopathic doctor will refer patients to and consult with physicians and other licensed health care providers, and a statement that the naturopathic doctor will require patients to sign a consent form that states that he practice of naturopathy is limited to the scope of practice specified in the statue and regulations. [R.I. Gen. Laws Sec. 5-36.1.12; Md. Code Ann. Sec. 14-5F-12]
4. Define the standard of care with reference to a *prudent health care practitioner* acting in the same or similar circumstances. Defining the standard of care in terms of how a naturopathic doctor would act in the same or similar circumstances fails to protect the public from bogus diagnostic tests and unproven or disproven remedies, which are in wide use among naturopathic doctors.
5. Make naturopathic doctors subject to the provisions of state law relating to contagious and infectious diseases and the reporting of same. [R.I. Gen. Laws Sec. 5-36.1-7]
6. Prohibit naturopathic doctors from:
7. Prescribing, dispensing or administering any legend medications or substances controlled pursuant to the federal Controlled Substances Act, 21 U.S.C. Sec. 812 and state law.
8. Use, for therapeutic purposes, any device regulated by the FDA that has not been approved by the FDA.
9. Perform surgical procedures, including minor office surgery.
10. Practice, or claim to practice, as a medical doctor or physician, a doctor of osteopathic medicine, a primary care doctor, primary care practitioner, primary care provider, or primary care naturopathic doctor.
11. Use general regional or spinal anesthetics or procedural sedation.
12. Administer ionizing radioactive substances for therapeutic or diagnostic purposes.
13. Advise patients regarding prescription drugs beyond possible dietary supplement/herb – prescription drug interactions.

[R.I. Gen. Laws Sec. 5-36.1-5]

1. Limit naturopathic scope of practice to providing health education and health counseling and the recommendation of dietary supplements as defined by the federal Dietary Supplement Health and Education Act and non-prescription drugs. We recommend against allowing the use of homeopathy because it is widely accepted in the scientific community that homeopathy is not effective for any disease or condition.
2. Require that registered naturopathic doctors, other licensed health care practitioners, health care facilities, or state agencies file a written report, within 30 days, to the Board if there is reason to believe that a registered naturopathic doctor is or may be:
3. Medically or legally incompetent;
4. Engaged in the unauthorized practice of naturopathic medicine;
5. Guilty of professional misconduct; or
6. Mentally or physically unable to engage safely in the practice of naturopathic medicine. [Md. Code Regs. Sec. 10.32.22.04]
7. To avoid public confusion, a person registered as a naturopathic doctor may use the title “registered naturopathic doctor” or “registered doctor of naturopathy” or the initials “R.N.D.” A person registered as a naturopathic doctor shall not use the term “naturopathic medical doctor” or the initials “N.M.D.” [Colo. Rev. Stat. Sec. 12-37.3-110]
8. Code of Ethics: We recommend that the Maryland Board of Physicians regulations governing the practice of naturopathic medicine, Md. Code Regs. Sec. 10.32.21.19, be adopted in their entirety regarding a Code of Ethics.
9. Advertising: We recommend that the Maryland Board of Physicians regulations, Md. Code Regs. Sec. 10.32.21.18, be adopted in their entirety regarding naturopathic advertising.
10. Grounds for Discipline: We recommend that the Maryland Board of Physicians regulations, Md. Code Regs. 10.32.21.12, be adopted in their entirety regarding grounds for disciplining naturopathic doctors.

***Conclusion***

Given the limited education and clinical training of naturopathic doctors, the plethora of unvalidated testing and unproven and disproven treatments used in their practices, and their rejection of evidence-based medicine, the Society for Science-Based Medicine believes that a limited scope of practice and stringent regulations will best serve the public’s interest. We stand ready to further assist the Pennsylvania State Board of Medicine in whatever way we can.

Respectfully submitted,

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1. Should the referenced webpages from the PANP and the AANP be taken down, SFSBM would be happy to provide the Committee with copies. [↑](#footnote-ref-1)