



May 26, 2022

Chairman VanderWall and Members of the Committee,

As public health advocates, **we strongly encourage you to oppose Senate Bill 990**, legislation that would create a serious public health risk by licensing naturopathic practitioners and classifying them as physicians.

Allowing naturopaths to be classified as physicians will pose a great risk for patients who may believe they are receiving medical care. Due to the lack of scientifically proven treatment methods and clinical training, naturopaths may fail to recognize medical conditions resulting in misdiagnosis or performing unsafe and/or ineffective treatment. According to the National Institutes of Health, the use of dietary supplements instead of or in combination with prescriptions, a practice commonly employed by naturopaths, can result in life-threatening outcomes to patients.¹ For example, United States Food and Drug Administration was forced to issue an alert warning of the significant safety risks, including cardiac arrest and even death, associated with a mineral salt that naturopathic practitioners used as an alternative treatment for cancer.²

The discrepancy in education requirements for naturopathic practitioners compared to those for physicians is alarming and should raise a red flag in the consideration of this bill. Naturopaths only need a four-year degree consisting of 4,100 hours of hands-on and classroom training and no residency program is required.³ There is also no admissions test for naturopathic schools, making entry widely attainable, and while there is a naturopathic licensing exam (NPLEX), it has never been independently reviewed to determine whether it adequately vets graduates. In contrast, Allopathic Doctors (MD) and Osteopathic Doctors (DO) attend four years of accredited medical school after receiving their four-year bachelor's degree, **followed by three to seven years of accredited residency training**, receiving more than 15,000 hours of hands-on clinical training.⁴ They are also subject to a rigorous medical school admissions test (MCAT), as well as the three-step United States Medical Licensing Examination throughout medical school

¹ https://ods.od.nih.gov/HealthInformation/DS_WhatYouNeedToKnow.aspx

² <https://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/PharmacyCompounding/ucm614211.htm>

³ <https://naturemed.org/faq/faq-how-are-naturopathic-doctors-educated-trained-and-licensed/>

⁴ <https://www.tafp.org/Media/Default/Downloads/advocacy/scope-education.pdf>

and residency, and, once licensed, are subject to countless hours of continuing medical education requirements.

Our professional careers are dedicated to serving our patients and protecting the health and safety of the public. The practice of medicine is grounded in science and is evidence-based. Practices such as herbalism and homeopathy, as often used by naturopaths, are seriously lacking in safety and efficacy. These practices could negatively affect patients' health outcomes, further complicate treatment methods, or worse.

The vast majority of states, even those that regulate naturopathic practice, do not recognize the title "naturopathic physician." Some states even expressly **prohibit** the practice of naturopathy.

The passage of this bill would bring a higher level of legitimacy and recognition to a practice that is lacking in evidence at best and downright dangerous to the public at worst. We urge you to **VOTE NO** on Senate Bill 990.

Sincerely,

Michigan Academy of Family Physicians
Michigan State Medical Society
Michigan Health and Hospital Association
Michigan Chapter American Academy of Pediatrics
Michigan Osteopathic Association
American College of Obstetricians and Gynecologists
Michigan Association of Osteopathic Family Physicians
Michigan Association of Health Plans
Blue Cross Blue Shield of Michigan