

Michigan Academy of Family Physicians
Testimony before the Senate Health Policy Committee
on Senate Bill 990
May 26, 2022

Good morning. Thank you Chair VanderWall and members of the Senate Health Policy Committee for the opportunity to speak to you today. My name is Dr. Mark Hamed. **I am practicing Family Physician and Emergency Department Physician, double-board certified by the ABFM and the ABEM- Emergency Medical Services.** I am also the Chair of the Board of Directors for the Michigan Academy of Family Physicians. We are the state's largest specialty physician organization, which represents more than 4,200 family medicine physicians, residents, and medical students. Today I am testifying in strong opposition to Senate Bill 990.

This legislation would be harmful to our patients – and your constituents – as it allows individuals, who are not educated in the practice of medicine, to treat patients, prescribe medication, and provide medical care, including surgical procedures. When you as policymakers make the decision to grant licensure to a group of health professionals you are giving the state's official endorsement that a practice is safe and evidence based. The standard for licensure is and should be high as it gives the public confidence that a group of health professionals is educated, trained and experienced in the particular field of health care they are licensed to practice. Unfortunately, in this case should this bill pass, it would be a false confidence – misleading at best and potentially dangerous.

Naturopaths must never, under any circumstances be allowed to use the title “Physician,” as their education does not prepare them to diagnose and treat diseases or other illnesses. Naturopathic education is not medical school, and they are often educated in unproven botanical treatments or homeopathic remedies as an alternative to scientifically backed medical treatments. Naturopathic schools do not require an entrance exam, and their licensing exam has not been independently reviewed to show its efficacy. There is no residency training requirements for naturopaths (as it's optional) and naturopaths that do undertake a residency they may train for 500-1000 hours, which is less than 10% of the nearly 12,000 clinical training hours that a physician will receive.

To give prescription medications correctly and safely, allopathic and osteopathic physicians are trained through medical school and residency to understand anatomy, physiology, pharmacology and the pathophysiology of diseases, naturopathic training is not sufficient to meet these standards. In naturopathy, there is a belief that “you let the body heal itself. You do not give medications.” Essentially, “magical thinking” is major part of the naturopathic philosophy. How prescriptions will fit into this magic is uncertain. Prescription medication seems contrary to the basic premises of naturopathic theory. Naturopaths routinely complain that prescriptions

medications don't treat disease, it masks them. The underlying philosophy of naturopaths is to avoid prescribing medication, so why are they asking for the ability to prescribe now? The pharmacology foundation of their education is clearly not sound enough to prescribe medications safely and effectively.

Allowing naturopaths to engage in a wide range of treatment methods including intravenous are dangerous. Ozone therapy is one such case of unsafe practice that is endorsed by the naturopathic profession. Naturopaths claim that ozone, a highly reactive gas, can be used to treat a plethora of serious medical conditions, including cancer, autoimmune disorders, cardiovascular disease, Alzheimer's, diabetes and HIV infection. The most common type of ozone therapy used is major autohemotherapy, in which blood from the patient is drained into an IV bag, mixed with ozone gas and re-injected into the bloodstream. This therapy has been labelled as unsafe by the Natural Medicine Database and even the FDA issued a statement that "ozone is a toxic gas with no known useful medical application.

Naturopathic education and philosophy is that the body is self-healing; and their education clearly shows naturopaths are not a safe or cost-effective choice for ordering diagnostic testing. This is supported by the latest research: In an October 2021 study in the American Journal of Clinical Pathology¹, naturopaths ordered nearly double the tests per patient as compared to general physicians. Most of these tests ordered by the ND had lower rates of abnormal results, indicating inappropriate and wasteful test ordering strategies by NDs. This will lead to an increase in healthcare expenditures to Michiganders and more importantly to delays in patients receiving appropriate care.

A 2019 study in the American Journal of Gastroenterology² analyzing statements on naturopathic providers websites across 10 major US cities showed that nearly 40% of the naturopathic providers websites advertised that they diagnose celiac disease with tests other than the evidence-based gold standard tests. This can lead to patients spending their hard-earned money on tests and treatments with no track record of success, the risk that patients will be misdiagnosed, or even get sicker while a proper diagnosis is delayed.

We are not saying naturopathy should be banned outright as people are free to access naturopaths currently, should they choose. However, the official sanctioning of their practice by the state and expanding what they lawfully are allowed to do, is misguided and downright irresponsible. We must not put your constituents and our patients in harm's way by allowing naturopaths to practice primary care medicine.

I strongly urge you to oppose Senate Bill 990. Thank you for the opportunity to testify today. I am happy to answer any questions you have.