

My name is Sandra Carbonari, and I am a member of the Executive Board of the Connecticut Chapter of the American Academy of Pediatrics. I am writing on behalf of our over 600 pediatrician members **in opposition to SB 1325 AN ACT PERMITTING NATUROPATHIC PHYSICIANS TO PRESCRIBE AND ADMINISTER VITAMIN B12.**

The American Academy of Pediatrics (AAP) and the Connecticut Chapter of the AAP advocate that every child receive high-quality, accessible, family-centered, continuous, coordinated, comprehensive care in a medical home. To this end, optimal pediatric care is best delivered in a team-based approach that is led by a primary physician, ideally a pediatrician, who assumes responsibility for managing the patient's care. All professionals who provide pediatric care must hold to the highest standards of education and training and continually demonstrate their skills and competencies.

Naturopathy is guided by a philosophy that emphasizes the healing power of nature. Naturopaths use both traditional and modern therapies (approaches they consider to be the most natural and least invasive) and view their role as supporting the body's inherent ability to maintain and restore health. Naturopathic medicine combines many methodologies, such as acupuncture, massage, chiropractic adjustment, homeopathy and herbal cures, along with sensible concepts such as good nutrition, exercise and relaxation techniques. There is currently little evidence on the use of naturopathy in medical conditions in children.

Vitamin B12 is readily available in over the counter oral preparations. Therefore, presumably this bill is requesting the ability to prescribe and administer it either intramuscularly or intravenously.

This request is problematic in several ways:

- There is no reference to the age of the individual who would be treated by a naturopath with vitamin B12. Children who truly have a vitamin B12 deficiency often have multiple medical issues related to the gastrointestinal tract or an inadequate diet. These

are medical problems that need to be treated in a pediatric medical home.

- Intravenous and intramuscular dosing is not well established in pediatric patients. All aspects of a child's medical conditions must be considered when determining the correct dose for an individual child.
- Administering intravenous medications to a child is a skill that is developed during the years of pediatric training. It is a skill that is neither simple nor easily mastered without a great deal of practice.
- The American Naturopathic Medicine Association, the professional organization of naturopathic practitioners, states "Naturopathy or naturopathic medicine never includes minor surgery or prescription drugs. Instead, clients are advised to seek out properly trained professionals that provide such services. Naturopathy does not cure disease. Instead, naturopathy supports the body while going through traditional medical treatment programs that may over stress the body".

Connecticut pediatricians have grave concerns related to the naturopath's requests to have: A) The ability to independently prescribe and dispense pharmaceuticals including Vitamin B12 and B) The ability to independently administer pharmaceuticals including Vitamin B12 through various routes including intramuscular and intravenous.

The training to become a Pediatric Specialist includes four years of medical school, during which Medical Pharmacology is first approached as a basic biomedical science and later focuses on therapeutics and clinical applications. The study of pharmacology continues during postgraduate training, i.e. residency, which is at least 3 years long. At least 12,000 hours of patient care are required to be certified. During that time, we focus specifically on the unique needs and differences of prescribing medications to children from birth through young adulthood.

A license to practice Naturopathy requires 4 years of study at a naturopathic school. A typical curriculum in Naturopathic training has a total of 4 credits of pharmacology in a 300-credit program. Naturopaths are not required to complete a residency or fellowship and are mandated to have only 1200 hours of patient care hours for licensure. This is not adequate preparation for prescribing medications to children. It is certainly not adequate to develop the skills needed to administer medications through the various routes requested especially intravenously, intrauterine, vaginally, or in the eye.

We believe that there is value in nontraditional therapies such as acupuncture and massage, and certainly share in the philosophy of the importance of prevention as well as good nutrition. However, practitioners of Naturopathy are not adequately trained to prescribe or administer medications, especially to children.