



MDDCSAM is the Maryland state chapter of the American Society of Addiction Medicine whose members are physicians and other health providers who treat people with substance use disorders.

HB 520 UNFAVORABLE

State Board of Physicians - Naturopathic Doctors - Scope of Practice, Renewals,
and Professional Liability Insurance

Health Committee

Feb 17, 2026

Granting naturopaths authority to prescribe opioids can be predicted to worsen the epidemic of overdose deaths, which famously followed the rise of inappropriate prescribing by physicians and other prescribers. **Even when well-trained physicians prescribe opioids, a significant proportion of recipients will develop opioid use disorder, contributing to overdose death.**

Due to the inherent risk of prescribing full opioids **(1)** by any group of prescribers, the MD Dept of Health launched the "Talk to Your Doctor" public awareness campaign in 2018 to encourage patients to remind their doctors about opioid alternatives. Government agencies have also addressed inappropriate prescribing: "When the Prescription Becomes the Problem" (CDC), "Encourage Safer Opioid Prescribing" (NIH), and the "Over-Prescriber Support Strategy" (CMS). **Harmful over-use of prescription benzodiazepines is also a problem**, related to liberal prescribing of alprazolam (Xanax) and others.

Practitioners trained in unscientific therapies would exacerbate harmful use of various drugs. There can be pressures to prescribe controlled substances from patients, drug companies, etc.

The fact that naturopaths are trained in debunked therapies that are devoid of scientific merit casts doubt on their ability to critically evaluate medical information.

Bastyr University is a prominent accredited naturopathic university. In the overview of their Naturopathic Doctorate Degree Program, **homeopathic medicine** and herbal medicine are two of the seven integral areas of study. **(2)**

'The Natural Medicine Journal,' published by the American Association of Naturopathic Physicians, features articles such as "Tapping into Your Patient's Biofield to Optimize Healing," **(3)** and claims that "Naturopathic hydrotherapy works on the emunctories and vital force." . . . Hydrotherapy . . . stimulates the immune, nervous, and circulatory systems using . . . sine wave electrical stimulation, . . . boosts detoxification and treats chronic fatigue, infections... helps with digestive issues . . . chronic disease, immune support (colds/flu), anxiety, headaches, autoimmune disorders, and boost vitality."
(4)

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Homeopathy, developed in the 1700s, has been debunked as “pseudoscience” in the scientific literature. “The assumptions underlying homeopathy violate fundamental laws of nature. It does not have any explanatory power and fails other criteria established for a scientific approach. Two large-scale efforts have recently documented that in spite of a plethora of clinical trials there is no evidence that homeopathic remedies have any therapeutic effect beyond that of a placebo.” (5)

“[Homeopathy’s] implausible basic assumptions ... contradict natural laws... There is no study or systematic review that reliably certifies homeopathy to have an effect beyond the placebo effect.

It displays clear characteristics of pseudoscience.” (6) “Any normative basis of medical ethics will make [Homeopathy] unethical, as a defense of homeopathic practice requires the rejection of modern natural sciences.” (7)

We urge an unfavorable report.

Respectfully,

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