



Supporting
Nurses
Using
Homeopathy

November 16, 2015

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, NW, Room CC-5610 (Annex B)
Washington, DC 20580

To Our Esteemed FTC Colleagues:

The Homeopathic Nurses Association (HNA) is eager to submit our response to the recent FTC workshop. As nurses promoting holistic health, we advocate for the right of our clients and patients to informed choice with any and all of their health care needs.

As both consumers and practitioners, members of the Homeopathic Nurses Association have a unique perspective. Many of us were consumers long before becoming practitioners and have experience with the issue of labeling and information.

ABOUT THE HOMEOPATHIC NURSES ASSOCIATION

The Homeopathic Nurses Association (HNA) was founded in 1984 as a forum for nurses interested in the art and science of Homeopathy. Initially, HNA provided information to nurses and to the public regarding homeopathy and its history. However, the significant number of American consumers who continue to meet their health care needs by increasing their use of complementary and alternative therapies has allowed for a reemergence in homeopathy in the United States (Barnes, Bloom, Nahin, 2008). This phenomenon underlies the increased number of homeopathic nurses who inform, suggest, and utilize appropriate homeotherapeutics in their practice. HNA continues to be a forum for information as well as the organization representing professionally practicing nurse homeopaths and nursing students in the United States.

As one of the most trusted professions in this country (per the Gallop Poll), nurses have a unique role in providing quality health care to Americans. We act as advocates, educators, and clinicians for millions of people accessing the health care system every day. We also hear from our clients and patients about their desire for safe and effective holistic care, and specifically, homeopathy. As homeopathic professionals, we assist our clients in finding the right remedy for their situation. We have observed that our clients do a tremendous amount of research on their own, and ultimately feel comfortable with their remedy selection.

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EVIDENCE SUPPORTING HOMEOPATHY & HOMEOPATHIC MEDICINE

Homeopathy is listed as one of the ten most common complementary health approaches among adults in the US (Black, Clarke, Barnes, Stussman, & Nahin, 2015) and ranks fifth among children (Clarke, Black, Stussman, Barnes, & Nahin, 2015) according to the 2012 National Center for Complementary and Integrative Health (National Coordinating Center for Integrative Medicine, 2012). These statistics show nearly a double of that reported in 1990 by Eisenberg and colleagues (Eisenberg, Kessler, Foster, Norlock, Calkins, & Delbanco, 1993).

Hundreds of homeopathic studies of individual and epidemic treatment have reported no serious adverse events (Mathie, Legg, Clausen, Davidson, Lloyd, & Ford, n.d.; New Database of Clinical Trials in Homeopathy, 2015). Studies showing the efficacy of homeopathic medicines have been published in many peer reviewed journals (Gaucher, Jeulin, Peycru, & Amengrul, 2006; Mathie, 2003). The largest epidemiological study of homeopathy, conducted in Cuba in 2007, involved 2.4 million people who received 4.8 million doses of a complex homeopathic preparation as immunization against leptospirosis (Bracho et al., 2010). There were no serious adverse effects reported and only 12 cases of mild adverse effects, 1/2% per 100,000 persons treated (Bracho et al., 2010). Clinical trials of infectious diarrhea in Nicaragua reported no serious adverse effects in patients treated with homeopathic preparations (Jacobs, Jonas, Jimenez-Perez, & Crothers, 2003).

The Swiss government issued a report in a recently published book on homeopathic medicine that offers a comprehensive evaluation of homeopathy (Bornhoft & Matthiessen, 2011). Swiss health care practitioners and consumers alike were the driving force behind the Swiss government's investigation of homeopathy. The results yielded cost effective and "real world effectiveness" of homeopathy and its inclusion for reimbursement by the Swiss Government (Bornhoft & Matthiessen, 2011).

And a recent paper published in PubMed titled: Randomized controlled pilot study to compare Homeopathy and Conventional therapy in Acute Otitis Media (Sinha MN¹, Siddiqui VA, Nayak C, Singh V, Dixit R, Dewan D, Mishra A., 2012), found "that Individualized homeopathy is an effective conventional treatment in Acute Otitis Media (AOM), there were no significant differences between groups in the main outcome. Symptomatic improvement was quicker in the Homeopathy group, and there was a large difference in antibiotic requirements, favoring homeopathy." AOM is probably the most common illness suffered by young children and being able to select homeopathic remedies gives parents and health professionals an evidence-based treatment option and peace of mind.

ROLE OF HOMEOPATHIC NURSES WITH CONSUMERS

Homeopathy is uniquely well suited for nurses to recommend and to practice professionally and follows the holistic nursing model that "recognizes the totality of the human being - the interconnectedness of body, mind, emotion, spirit, social/cultural, relationship, context, and environment. It is necessary to address all these components to achieve optimal therapeutic results" (American Holistic Nurses Association, 2015).

Nurses take a number of significant roles with respect to homeopathy and consumers:

- Nurses who are educated in homeopathy are positioned to assist clients with decisions regarding safety, cost effectiveness, and efficacy of healthcare choices, including the use of OTC homeopathic remedies

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- Using Homeopathy as an alternative to the unintended side effects and the spiraling costs of conventional pharmaceuticals gives consumers a safe and cost effective choice for their minor self-limiting ailments. And when the condition (or illness) is more chronic in nature, consumers should be educated to visit a well-qualified homeopath.
- Homeopathic nurses are therapeutic partners with their clients in a process that facilitates optimal health
- We know that a homeopathic ingredient combined with non-homeopathic ingredients are not homeopathic drug products, as defined in current FDA regulations and homeopathic principles. While this definition is clear, perhaps there could be stronger enforcement of this section. These concoctions should not be labeled as "homeopathic". Furthermore, it's important that homeopathic products not be labeled as remedies for chronic illnesses or life-threatening issues, like asthma or diabetes. Labeling in such a way is not part of homeopathic principles and guidelines set forth in the Homeopathic Pharmacopoeia of the United States (HPUS).

In conclusion, we feel that homeopathic over-the-counter drug products (OTC) play a pivotal role in our therapeutic care plans as well as effective self-care, and that consumers should continue to have OTC access to remedies. We are also confident that the current labeling of homeopathic products protects consumers and allows them access to safe medicines in making sound choices for their health care needs.

Respectfully submitted:



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