



# Oregon

Tina Kotek, Governor

Board of Naturopathic Medicine  
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## Oregon Board of Naturopathic Medicine –Bi-Monthly Board Public Meeting Minutes \*DRAFT

**Date/Time: December 8, 2025 / Open 12:19pm - Adjourned 2:56pm**

**LOCATION: 800 NE Oregon Street, Room 1C & Zoom**

1. **Roll Call: ND Members Present:** Board Chair Ryan Minarik, ND; Board Co-Chair Meghan Larivee, ND; Board Members: Ryan Martin, ND, Shehab El-Hashemy, ND, BSc, HBSc, MBChB, MEd;  
**Public Members:** Kate Watkinson Wright, JD and Josh Lueper, DAc, LAc, BCSI  
**Excused Absence:** Zia Robles-Hernandez, ND  
**Board Staff:** Mary-Beth Baptista, JD, Executive Director  
**State Representatives:** Haylee Morse-Miller, Senior Legislative Analyst / Legislative Office, JeaLinda Patton CFO Analyst - DAS
2. Case Resolution Update / Discipline Recommendations
  - a. **(23-08-31) – Board Vote 6-0: NOPD – Violation Negligent Prescribing 850-050-0010(1)(c)(A): / Discipline:**
    - i. 12m probation
    - ii. \$5k - civil penalty,
    - iii. CE - 4 hours on benzos and controlled substances
  - b. **(23-10-34) – Board Vote 6-0: Dismiss no violation**
  - c. **(24-06-18) – Board Vote 6-0: Dismiss no violation**
  - d. **(24-07-20) – Board Vote 6-0: Dismiss no violation**
  - e. **(24-07-22) – Board Vote 6-0: Dismiss no violation**
3. Continue Investigations over 120 days. **Board Vote 6-0: Continue investigations over 120 days**
4. Approval of October 13, 2025, Executive & Public Meeting Minutes. **Board Vote 6-0: Approved Executive and Public Meeting Minutes – no edits or changes.**
5. Thentia (Agency contracted database provider) Receivership Status, Cost Increases, Potential Provider Changes.
  - a. **Board Discussion:** ED explained that the Thentia (database provider) contract expired October of 2024. HRLBs are all part of one contract. When OBNM ED and DAS developed the budget we anticipated some increase of costs when renewing Thentia for minor cost increases and inflation adjustments. ED / HRLBs attempted multiple times to get the contract renewed through procurement / DAS in late 2024-Early 2025. Unfortunately, we experienced many stop / start delays in the process. OBNM/HRLB started the negotiations through procurement with Thentia in Spring of 2025. Thentia has been very difficult, and interactions b/w HRLB and procurement through the process have also been strained and difficult. HRLBs / procurement learned in late Oct / November that Thentia entered into a receivership – basically “bankruptcy light” – which means the banks / lenders / VC have called in their loans and now are overseeing Thentia’s financial dealings – which has made and already difficult process more difficult. What that means for Board / HRLBs – is that we have to agree to an extension to the contract for the database services with Thentia that does not provide any security

guarantees, and the database services will be “as is” and leaving the HRLBs liable for any security breaches. Board / HRLBs do not have any choice – if we don’t agree to their conditions then it would be the end their services immediately. Signing the “as is” contract extension will get us through March 2027 – at approximately the agreed upon rate – but for less than two years as budgeted – so it will be over approx. 8k than budgeted. Procurement is currently setting up an open call / recruitment for database providers, and the State will review the bids and choose authorized providers for State agencies to use under a secured price agreement. Timing of this open bid process is not set or exactly on the mark from what we were told – but hopefully will be in place prior to the Thentia contract extension expires in March 2027. Procurement is going to choose multiple bids to accommodate the needs of different size Boards with vastly different licensure needs. However, based on research done by similarly situated Board to the HRLBs the price agreements / next contractor will be approximately 50k for a database – double than what we anticipated in the next biennium. Board / HRLBs anticipated / planned in next biennium budget databases services to be approximately 28k annually – we now know that will likely be closer to 50k – double of what we planned for. The call for bids is supposed to open in early Jan 2026, and close spring / April 2026. After the bids are received procurement – with volunteers from Boards and Commissions will the providers based on criteria set by procurement, hopefully by the end of 2026. ED is concerned regarding the timing – and whether there will be an overlap b/w paying the new vendor from the bid / price agreement and having to continue to pay Thentia under the extended contract. ED has worked with procurement and other small Boards to ensure that procurement request for bids is appropriate and realistic for small board needs and budgets. There is no option to go out and find an independent contractor for our Board, we need to go through procurement and use the State approved vendors – under the agreed upon price agreements with State approved security provisions.

6. Board Fee Increase, Board Limitation Increase – Board Review and Ratification

A. Fee Increase Proposal AY 2029 – Supporting Documentation for Fee Increase:

- **ED / Board Discussion re: Budget Projections / Limitation Explanation:** When developing the 25-27 budget – ED/DAS discussed anticipated cost, and inflation increases in the next biennium but believed we could get through the 25-27 biennium without raising fees. However, costs increased well beyond what we anticipated. There are two parallel considerations when deciding whether the Board must raise fees. Limitation – is the limit the Board is allowed to spend out of their budget. Board is required to maintain an approximately 6-month reserve at the end of the biennium, meaning the Board can spend up to the required reserve. Boards are allowed to ask for more limitation – meaning ask the legislature to dip into that 6-month reserve. But it is very unlikely that that legislature will allow you to dip into that limitation fund – if the Board isn’t also increasing income. Overall Board Biannual Budget - we base the biennium budget projections on “actuals” i.e. what have we spent in the past per budget line item, with “a buffer” based on anticipated cost increases / inflation. However, the increase in costs was well above what we anticipated during the budget build. Due to significant increases well beyond projected – e.g. SFS went up approx. 38% - if we do not raise fees, we will only have approx. 2 months at the end of the 27-29 biennium, well below the 6-month reserve. Board reviewed all documents explaining the increases in costs per budget line, and where the budget is in the red, to ensure transparency for the Board and the public to understand why we need to raise fees to get through 27-29 biennium with a 6-month balance. Professional Services – services contracted out -

discussed the financial records / line-item costs to the Board per FY / AY actuals for AG fees, SFS fees, IT professional services, State Govt Services Charges, other services etc. and what the services these agencies provide to the Board. Personal Services – internal costs of the Board - employees/Board; employee benefits - which are approximately 50% of salary – in addition to salary; totaling approximately \$500,000 a year. Discussed COLA increases and PERS contribution increases and a new salary step increase for employees passed by the legislature but not funded by the legislature and how that impacts the Board budget and limitation. Discussed that the Governor values autonomous Boards and the Legislators also value direct contact with them – and it is a priority for both that we maintain our current structure as director reports. ED explained she talked with Gov. liaison re: her concern the small Boards, like OBNM, will be able to maintain this autonomy without addition financial support – either via a sliding scale on costs passed down to small boards by professional service agencies or support through general fund – b/c there is a breaking point and only so much we can put on the back of 1250 licensees before it becomes a barrier to licensure. ED made as many reductions as possible to all costs under her control to maintain a 6-month limitation in the last legislative session to avoid having to raise fees; e.g. ED worked diligently with DAS to slash the rent by thousands of dollars – but costs completely out of our control were significantly more than we anticipated and now we have no other choice.

- **ED / Board Discussion re: Fee Increases / Draft Rule:** Important note – the Board is 100% self-funded – all funds come from licensees –licensure fees / civil penalties and small administrative fees for services. The Board is not subsidized in any way from any outside funds. Per the adjusted projections to get us to the 6-month contingency at the end of 27-29 biennium, we need to raise fees by 28.5%. In the draft rule with the proposed fee increases, ED raised fees primarily for active / inactive licensees – for NDs that have established practices and made every attempt to limit increases on new licensees and licensee applicants - with as minimal as possible increases to jurisprudence exam, applicant fee etc. ED also discussed this with OANP ED and OANP legislative committee – that she was keenly aware of the need to encourage - not discourage or create barriers for new licensees / licensure applicants in Oregon. ED also added charges for items/services we have not previously charged for -e.g. licensee verification, and increased cost of mailing lists requests. The draft rule also adjusted the prorated licensure fee as two rates instead of four, divided by first / second 6 months of the year, rather than quarters. This was necessary b/c NPLEX scores coming out later and were having a negative impact on the income generated by former prorated licensure fee schedule. Board reviewed spreadsheet comparing fees of other jurisdictions (WA / CA / AZ) – which showed the fee proposal for OBNM resulting in some licensure fees being slightly higher than AZ and WA, and on par with others. All new fees are lower than CA. ED tried to keep as close to WA / AZ as possible. Looked at documents that show per increase the amount the increase will earn. JeaLinda Patton and Haylee Morse Miller agreed we captured all that was necessary to discuss re: the fee increases / draft rule.

7. Request for Fee Increase - Approve / submit the fee increase request documents to DAS/legislature: **Board Vote 6-0**
8. Draft Rule – 850-030-0035 – Fee Increase – Review and Approve for Submission to SOS
  - a. **Board Vote 6-0:** Submit OAR 850-030-0035 as drafted to raise fees to SOS. Board will need to have a special session at the end of January to review public comment and

vote whether to approve rule at the end of January.

9. Draft Rule - OAR [850-040-0250](#) - Correction to Rule Re: Ketamine Education Requirements in Rule Title:

- a. **Board Discussion:** ED made error to the title when rule was moved to the CE section/chapter of the OAR, inadvertently changing the rule requirements / or the appearance of a change of the rule requirements. Draft of OAR corrects the admin error and restores the intent of the rule requirements.
- b. **Board Vote 6-0:** Submit OAR [850-040-0250](#) as drafted to make correction to the title and clarification of the requirements to SOS.

10. Request for Additional Limitation and Implementing OBNM 10% Reduction Proposal:

- **ED / Board Discussion:** CFO is not moving forward with the Board request for increased limitation because they want to see the effect of the fee increases and implementation of some of the 10% reductions and have a more accurate projection for database costs through the pending price agreements before proposing an increase in limitation. Board will not vote on the increase of limitation documents at this time. ED is moving forward with some of the 10% reduction proposals submitted as part of the 25-27 budget process:
  - (1) Reducing in-person public meetings from six a year, to four times a year – with remote meetings being in Feb and August. ED believes there is tremendous value in having in-person meetings, and the quality of the discussion / deliberations are more productive, efficient and effective, and does not want to eliminate all in person Board meetings unless we absolutely must. February generally has a weather event that disrupts the meeting / ability to travel, and due to summer travel – there are usually members some members that zoom in from remote locations in August. Discussion regarding annual costs for in-person Board meetings and cost savings for eliminating in-person Board meetings.
  - (2) Reducing Board member stipends for non-qualified members. Legislative changes were made to Board stipends in the 23-25 session, although not legally required per the statute, the Board members were paid a two-day stipend – a day of Board meeting prep and attendance at the Board meeting (total \$320). Moving forward – non-qualified members will be paid for the day of the meeting only (\$160). Qualified members (meaning board members who qualify for a stipend under the statute) will be paid the legislatively required two days per the statutory rate. Discussion regarding whether Board members could use Board service toward annual continuing education credit, discussed inequity for public members. Discussion that current public Board members are licensed professionals and will check with their respective Boards (OSB / OMB) and research whether pro-bono or service on the Board will qualify for CE. ED will write letters of support and provide any information needed for the public members.
  - (3) Board Retreat – Board generally has a retreat once a biennium for legislatively required strategic planning. Board will not have a retreat in the 25-27 biennium and will use a scheduled Board meeting to engage in strategic planning.
  - (4) Trainings / Out of State Travel: Board members / Board employees (have not) will not attend any outside training, engage in out of state travel.

- (5) Rent: Reduced to the lowest possible amount to maintain an office presence at PSOB through ED negotiations with DAS in 2024.

11. Draft Rule – Continue discussion whether to amend Draft to include fee for licensure review:

[850-030-0005](#)

RULE TITLE: Criminal Conviction Determination Process for Licensure

RULE SUMMARY: The rule implements SB 1552 (2024) section 44 allowing a person to petition a licensing board for a determination as to whether a criminal conviction would prevent the person from receiving a license. Section 44 and the rule become operative on July 1, 2025.

FILING CAPTION: Creates criminal conviction determination process to implement SB 1552 (2024)

- **Board Discussion:** ED explained that the rule will go forward with the fee imposed after the legislative session, not during the legislative session. All fee-bills based on statutes passed in the last legislative session will go into one omnibus bill for approval. No action, Board already approved the draft rule and has been referred to SOS and public comment period has closed.

12. Board Review of OBNM Fund Report

13. Discussion re: implementing / recommending a chaperone policy for NDs

- a. **Board Discussion:** Board member Shehab El-Hashemy asked for this to be on the agenda. Profession is evolving and other medical providers are required to offer chaperones, and offering a chaperone is moving toward being the professional standard. With the ND practice evolving – there are going to be more sensitive exams. The issue with the Board creating a rule requiring offering a chaperone is many NDs do not have employees to offer as a chaperone – especially in rural areas. Questions regarding when will a chaperone have to be offered? What will be the definition of a sensitive exam? What will it mean to “offer” / provide? Would OBNM follow the OMB policy? ED discussed that there are significant differences in ND practice structures – solo, small clinic, large practices etc. Importantly in the last years she has been the ED she has heard / learned from the rural districts – outside of the I-5 corridor how different their practices and resources are, and those vast differences are not recognized or accommodated by the Board in the past. ED anticipates tremendous push back from that ND population if the Board imposes a chaperone rule. ED also does not see an overwhelming number of cases or discipline where this is an issue, and generally when the Board writes / imposes a new rule it is usually based on an uptick of cases, practice problem or expansion of scope of practice where rules have not kept up (e.g. injectable ketamine). Board member El-Hashemy will do additional research – how many solo practitioners are there in Or, and are there courses available to train chaperones, and discuss it in a future meeting.

14. CNME - Call for public comments on proposed revisions to accreditation standard VI and related definitions of terminology shared with the Board

15. Public Comment – no public comment.

[https://oregon.public.law/rules/oar\\_918-040-0040](https://oregon.public.law/rules/oar_918-040-0040).

*The Board is not required, nor do the Board members anticipate engaging in discussion with participants providing comments.*