

## CRUMPLER Robin \* OBNM

---

**From:** MEDICINE Naturopathic \* OBNM  
**Sent:** Monday, October 18, 2021 4:54 PM  
**To:** MEDICINE Naturopathic \* OBNM  
**Subject:** FAQ RESPONSES: OAR 850-060-0212 - IV / Injection Education / Training Reporting Requirements - DUE DEC. 31, 2021

Based on FAQs, please see below further explanation of [OAR 850-060-0212](#). Please note, the answers to ALL of the questions the Board received in response to the Oct. 15, email, are/were covered in the text of the rule and/or the instructive Oct. 15, email.

### **YOU MUST READ THE RULE TO UNDERSTAND THE RULE**

To aid in that endeavor:

- **850-060-0212 is divided by Injectate; Injection Site and IV Therapy.**
  - (1) Injection Therapy of Compounded, Manufactured, Injectable Grade Injectate:
    - (a) Subcutaneous, Intramuscular, Intravenous Injection
    - (b) Lower Body and Lower Body Extremity Injections:
    - (c) Upper Body and Upper Body Extremity Injections:
    - (d) Upper and Lower Body Spinal Injections
  - (2) Injection Therapy of Autologous Injectate:
  - (3) Ozone Injection Therapy:
  - (4) IV Therapy:
    - (a) Chelation IV Therapy:
    - (b) Ozone IV Therapy:
- **850-060-0212 Sections 1-4 (listed above) require licensees who want to practice / continue to practice in any of the Injection and IV therapies listed, to sequentially complete / have completed the corresponding training per Injectate / Injection Site / IV Therapy the licensee wants to practice or continue to practice.**
- **850-060-0212 Section (5) Continuing Education Provider Requirements:** Sets out the provider requirements per Injectate; Injection Site and IV Therapy (Sections 1-4 listed above), for the Board to approve education / training.
  - *Based on volume of questions received on this particular point – please note, as clearly stated in the rule:* Section 1(a): Subcutaneous, Intramuscular, Intravenous Preventive Injections; education must be provided by a Naturopathic Physician, Doctor of Medicine, Doctor of Osteopathic Medicine, or faculty of an accredited medical or naturopathic school or college. Courses taken at an accredited medical or naturopathic school or college may apply.
- **850-060-0212 Section (6) Continuing Education Reporting Requirements:** licensees who want to practice or continue to practice any of the Injection and/or IV Therapies listed above, are REQUIRED to report completed education/training per Injectate; Injection Site; IV Therapy the licensee wants to / to continue to, practice.
  - The Board recognizes there are a number of naturopathic doctors that have practiced Injection / IV therapy for a varying number of years. The rule is structured so that licensees that are

currently engaging in this therapy may submit for approval, **prior education / training acquired over the course of their years of practice** to satisfy rule training and education requirements.

- **The Board will not respond to emails asking whether or not a particular training “will qualify” or whether or not the Board “will or will not approve” a prior training.**
- **LICENSEES MUST FOLLOW THE REPORTING INSTRUCTIONS IN THE RULE / EXPLAINED PRIOR AND AGAIN BELOW:**
  - Licensees **solely** practicing therapy as described in Section 1(a) of the rule: Subcutaneous, Intramuscular, Intravenous Preventive Injections; **DO NOT** have to submit training and education for approval to continue to engage in this therapy.
  - Licensees Practicing IV/Injection Therapy for **more than ten (10) calendar years**: **MUST submit** a CV and a corresponding letter of explanation of education / training per section of the rule to the Board for approval by **December 31, 2021, to continue to practice Injection / IV therapy.** (of note – a licensee practicing more than 10 years may opt to use the attached reporting form in lieu of a CV / letter of explanation if more convenient)
  - Licensees Practicing IV/Injection Therapy for **up to ten (10) calendar years**: **MUST submit** the attached Education / Training Form to the Board for approval by **December 31, 2021, to continue to practice Injection IV Therapy.**
  - Licensees that **do not apply for training and education approval prior to January 1, 2022, AS INSTRUCTED ABOVE** - may **NOT** engage in IV / Injection Therapy until the Board approves the education / training required per rule.
  - Licensees that **apply for training and education approval AS INSTRUCTED ABOVE by December 31, 2021,** may **continue** to engage IV/ Injection Therapy up to the level of practice / section of the rule on their submitted application, pending Board approval.
  - All submissions for Board approval must be sent via email:  
[naturopathic.medicine@obnm.oregon.gov](mailto:naturopathic.medicine@obnm.oregon.gov)

**\*\* Of note, per OAR 850-040-0210: (10)** Licensees must retain proof continuing education hours earned for a minimum of five calendar years. **\*\***

- 850-060-0212(7) defines authority to practice / compliance necessary to practice Injection / IV therapy: An active Oregon license to practice Naturopathic Medicine and full compliance with 850-060-0212 is required prior to engaging in the following:
  - (a) Injection therapies that are medical in nature listed in Section 2(a)
  - (b) All injection therapies listed in Section 2(b)- Section 4.

REMINDER: As required, the Board provided notice, a draft of this rule, and opened a public comment period from JUNE 2020 – AUGUST 2020. The Board adopted this rule, including **ALL required training and education in SEPTEMBER 2020**. ALL LICENSEES were notified when this rule went into effect. Based on feedback, the Board revised the REPORTING requirements for this rule. Again, the Board provided notice in May 2021- that clearly stated **all training and education required in the rule remained the same, only reporting requirements changed**, provided a draft of the rule and a 45 day public comment period. The Board adopted the revised REPORTING requirements / revised rule in August 2021; and promptly notified all licensees.

<https://www.oregon.gov/obnm/Documents/Newsletters/SummerNewsletter%207.2020.pdf>  
<https://www.oregon.gov/obnm/Documents/Newsletters/Newsletter10.2020.pdf>

<https://www.oregon.gov/obnm/Documents/Newsletters/Newsletter%20Summer%2008.2021.pdf>

Per Governor Kate Brown's Executive Order 20-12, the Oregon Board of Naturopathic Medicine is closed to the public. Board staff will primarily work remotely for the duration of the order, therefore, email is the most efficient mode of communication at this time. We appreciate your patience.

In Health;

*Mary-Beth Baptista (She/Her) – Executive Director*

**PLEASE NOTE: UPDATED BOARD EMAIL ADDRESS:** [Naturopathic.Medicine@obnm.oregon.gov](mailto:Naturopathic.Medicine@obnm.oregon.gov)

Oregon Board of Naturopathic Medicine  
800 NE Oregon Street, Suite 407  
Portland OR 97232  
971/673-0193 MESSAGE ONLY  
971/673-0226 (fax)

On Fri, Oct 15, 2021 at 12:16 PM MEDICINE Naturopathic \* OBNM <[Naturopathic.MEDICINE@obnm.oregon.gov](mailto:Naturopathic.MEDICINE@obnm.oregon.gov)> wrote:

The Board of Naturopathic Medicine, in collaboration with the Formulary Council and the IV / Injection Therapy Subcommittee, adopted Oregon Administrative Rule 850-060-0212. In sum, this rule requires all licensees complete training and education prior to / to continue to engage in IV / Injection Therapy.

### **Key Provisions of the Rule:**

Education and training required in the rule must be completed sequentially.

Education and training required per section must be completed AND approved prior to engaging in the corresponding practice. (See Requirements below for additional instruction)

Requirement for ND's Practicing IV/Injection Therapy for more than ten (10) calendar years: submit a CV and a corresponding letter of explanation of education / training per section of the rule to the Board for approval by **December 31, 2021**.

Requirement for ND's Practicing IV/Injection Therapy for up to ten (10) calendar years: submit the attached Education / Training Form to the Board for approval by **December 31, 2021**.

All submissions for Board approval must be sent via email: [naturopathic.medicine@obnm.oregon.gov](mailto:naturopathic.medicine@obnm.oregon.gov)

*Licensees solely practicing therapy as described in Section 1(a) of the rule do not have to submit training and education for approval to continue to engage in this therapy.*

**Licensees that apply for training and education approval by December 31, 2021, may continue to engage IV/ Injection Therapy up to the level of practice / section of the rule on their submitted application pending Board approval.**

**Licensees that do not apply for training and education approval prior to January 1, 2022, may NOT engage in IV / Injection Therapy until the Board approves the education / training required per rule.**

Licensees may also submit education and training approved by December 31, 2021, and obtained in calendar year 2021, toward annual continuing education requirements for 2022 licensure.

Education / Training providers must meet the qualifications set forth in the rule in order to receive Board approval.

Education and training for injection required by the rule is regulated per injectate AND injection site.

Education and training for IV therapy required by this rule is regulated per therapy.