

## **Oregon Board of Naturopathic Medicine ♦Formulary Council Biannual Meeting Minutes ♦**

Conference Call/Zoom September 20, 2023 @ 9:30 am.

All members present except Adam Alani (Excused Absence)

1. Welcome new Formulary Council member Sammi Molvi, RPH. Thank you to Will McClatchy for his service.
2. Council Appointees / Council Terms: Board approved appointment on February 13, 2023; Dr. Carmen Ionescu & Dr. Adam Alani for 2 more years on the Formulary Council. Board discussed at February meeting that Council members serve two-year terms, with no term limits by statute or rule. The Board recommends the Council “self-impose” term limits of 6-8 years total - keeping in line with the Board term limits imposed by Statute. The Board wants to ensure the Council does not fall back into the pattern of the membership composition for years / decades, as it was when ED started in 2017, and it was generally the same members for approx. 15 years. The Board wants have efficient consistency but also recruit with a diversity / equity lens to ensure Council membership remains reflective of the changing profession and profession / State demographics.
3. Review March Council meeting packet and draft March meeting minutes. Council discussion of March agenda items / no outstanding matters.
4. Approval Formulary Council meeting minutes – September 21, 2022.
5. CE criteria for pharmacy credits: Review Board suggestions / draft proposals for pharmacy CE criteria. Provide Board recommendations for CE pharmacy criteria for credit.  
<https://www.acpe-accredit.org/pdf/ACPECPECommendationCriteria2020UpdatedJuly2022.pdf>  
[https://oregon.public.law/rules/oar\\_855-021-0010](https://oregon.public.law/rules/oar_855-021-0010)

Board of Pharmacy OAR 855-135 re: continuing education: ED advised Council the Board needs to change OBNM CE OAR 850-60 for multiple reasons. Most relevant to the Council – setting criteria to approve CE applications for pharmacy credit. Council reviewed OAR 855-135 criteria to determine if all / some of the enumerated criteria should be put into OBNM OAR 850-60.

Discussion Points:

- What are the important elements / building blocks for a solid rule setting criteria for pharm CE approval.
- Whether to allow Board of Pharmacy approved CE to be accepted by OBNM, and whether to incorporate the entire Pharm OAR into OBNM OAR.
- Ensure criteria involves medication management, whether to include management /

understanding combination of / contra indication of drug-herb interactions, or limit to education pharmacological medicine / formulary.

- Pharmacology means man-made prescription drugs; it does not mean botanicals medicine. Discussion / agreement with the Board that pharmacology CE should require education about pharmacological medicine.

Specific Criteria Discussion for OBNM OAR 850-60: Reviewed specific criteria to incorporate into the OBNM rule:

- Patient Safety / Medication Error prevention
- Clarify / limit “other aspects of health care” – limitation to drug-herb interaction?
- CE should have “examinations or other methods to evaluate”
- Limitations to education to only FDA approved drugs not appropriate for OBNM, compromise to make specifically state education is for off label use of pharmaceutical.
- Limitations around naming specific drugs / free from commercial bias.
- Dosing

Discussion regarding method to apply / submit for credit in same manner as Board of Pharmacy.

General discussion regarding whether OBNM should continue to approve CE programs, charge for approval of programs, or only allow approved providers to be submitted for CE, and whether to continue to allow licensees to submit applications for approval for programs attended. Adding courses approved by other health / medical Oregon Boards as “approved” providers.

6. Suboxone and elimination of the X-waiver: Discussion regarding DEA training requirement and Board action.

<https://www.samhsa.gov/medications-substance-use-disorders/training-requirements-mate-act-resources>

Board discussion regarding whether Board should require additional training beyond what is required by DEA to prescribe suboxone; and/or require a deadline of one year to complete the training for NDs. Board does not want to confuse the issue by proffering emergency rule /rule that adds an unnecessary layering of State rules on Federal rules. Board wants ED to send a reminder through the newsletter that this training is available now, and with all areas of practice if not adequately trained and error ensues, they can be disciplined. Majority of Council agrees with following the DEA/Feds lead on this issue and supports the Board not adding additional / conflicting rules, especially considering the serious opioid crisis happening in this country. One member expressed concerns with allowing NDs to prescribe without first taking the required DEA course.

7. Update from Council Chair Natalie Gustafson regarding major rule changes around compounding going into effect in 2023. US Federal standards for compounding are also going to drastically change as of Nov. 1, 2023. Update re: Oregon Board of Pharmacy compounding work group finalizing Board rules by October to comply with the new federal rules.

Chair notes it's been an ambitious year of rule changes for the Pharm Board. The Pharm Board

has not started the rule making process but has started gathering public comment. The rules will not be completed by October goal. Many states, along with Oregon, are in a state of limbo with a lot of uncertainty regarding compounding, especially around the subject of sterile compounding. Proposed rules will impact patient care and patient costs. Because of the amount of unknowns – Chair will wait to speak to the Board when she has more data. OANP / NUNM has not commented yet. MB will reach out to OANP legislative committee.

8. Formulary Meeting Schedule 23-25– Third Wednesday of Sept and March @ 930 – September 20, 2023; March 20, 2024; September 18, 2024; March 19, 2025. September 17, 2025 – Via Zoom