

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Wednesday, February 7, 2024 12:41 PM
To: MEDICINE Naturopathic * OBNM
Subject: OBNM PROPOSED CONTINUING EDUCATION RULES: Clarifications and Projected/Positive Impact on Licensees. Public Comment Open to Feb 12

From: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Sent: Wednesday, January 24, 2024 4:30 PM
Subject: OBNM PROPOSED CONTINUING EDUCATION RULES: Clarifications and Projected/Positive Impact on Licensees. Public Comment Open to Feb 12

Thank you to all who have submitted public comment on the proposed rules regarding the CE approval process. The public comment period is open through Feb. 12. The Board will review all public comments at the bi-monthly public Board meeting on Feb. 12. The public is welcome to attend the meeting. <https://www.oregon.gov/obnm/Pages/Board-Meetings.aspx>

Based on the comments received to date – please see the following clarifications and projected impact the rule changes will have on licensees:

- The rule **EXPANDS** the number of **approved** CE accreditation services, providers, and agencies **from four to nine**.
 - (a) Accreditation Council for Continuing Medical Education (ACCME)
 - (b) American Council on Pharmaceutical Education (ACPE),
 - (c) **Council on Naturopathic Medical Education (CNME)**
 - (d) The Federation of Naturopathic Medicine Regulatory Authority (FNMRA)
 - (e) North American Naturopathic Continuing Education Accreditation Council (NANCEAC)
 - (f) **Oregon Board of Pharmacy**
 - (g) **Oregon Health Authority**
 - (h) **Oregon Medical Board - Medical, Osteopathic approved education only**
 - (i) **Drug Enforcement Administration (DEA)**
- **IMPACT ON LICENSEES**
 - INCREASES the number of APPROVED ON-LINE and IN-PERSON courses available to licensees
 - INCREASES options for APPROVED ON-LINE and IN-PERSON programing for specialized categories – e.g. pharmacology, pain management, buprenorphine for opioid use disorder, and ethics
 - MINIMIZES the time-consuming burden on licensees having to complete self-directed approval applications
 - EXPANDS the diversity and inclusiveness of APPROVED naturopathic continuing education opportunities
 - MAINTAINS CURRENT BUDGET/FEEES THROUGH EFFICIENT USE OF BOARD FUNDS by ending the fiscally irresponsible practice of processing between 50-70 out-of-state / for-profit program approval applications monthly when several Board approved accreditation services exist entirely for this purpose.

- The rules **DO NOT CHANGE licensee’s ability to apply for CE approval** for up to 32 hours for completed structured continuing education and / or self-directed activities not accredited, provided, or approved by the rule. **IMPACT ON LICENSEES:**
 - INCREASES the number CE topic areas eligible for approval to fit licensees’ individual practice needs
 - MAINTAINS options eligible for approval for self-directed activities that directly benefit licensees and colleagues
 - MAINTAINS Oregon licensees (especially those who live or work out of state) ability to take ON-LINE continuing education
 - MAINTAINS licensee option to apply for approval for specialized CE course categories like pharmacology, pain management and ethics
 - MAINTAINS the diversity and inclusiveness of naturopathic continuing education opportunities eligible for approval

- Oregon Licensees who host **LIVE* programs held in the State of Oregon, attended by 10 or more Oregon licensees. may apply for approval on behalf of attendees.** (*Of note the proposed draft states the course must be “in person” – public comment suggests / Board will consider approving in-state **live** programs with remote participants.) **IMPACT ON LICENSEES:**
 - MINIMIZE the time-consuming burden on licensees having to complete self-directed approval applications
 - EXPANDS the options for self-directed activities that directly benefit licensees and colleagues
 - EXPANDS ability for licensees to seek out education programs that fit their individual practice needs
 - EXPANDS the diversity and inclusiveness of naturopathic continuing education opportunities

- **Allows NUNM and OANP* to apply for continuing education program approval.** (*Of Note – based on 2023 CE reporting data, Licensees earned and submitted the vast majority of their annual CE credit hours of Board approved education from NUNM, OANP, and the AANP annual conference. The Board will take this data and the public comment received and consider allowing AANP to apply for approval for the AANP annual conference.)
IMPACT ON LICENSEES:
 - MAINTAINS approval for ON-LINE and IN-PERSON courses licensees attended most frequently, for the majority of their annually required CE hours
 - MINIMIZES the time-consuming burden on licensees having to complete self-directed approval applications
 - MAINTAINS the ability for Oregon licensees (especially those who live or work out of state) to continue to take approved ON-LINE continuing education
 - MAINTAINS approval for courses in specialized categories like pharmacology, pain management and ethics
 - MAINTAINS CURRENT BUDGET/LICENSURE FEES THROUGH EFFICIENT USE OF BOARD FUNDS by ending the fiscally irresponsible practice of processing between 50-70 out-of-state /for-profit program approval applications monthly, when several Board approved accreditation services exist entirely for this purpose.

Please read the rules in their entirety to ensure an accurate understanding of the changes and the effect of those changes.

<https://www.oregon.gov/obnm/Pages/Notice-of-Proposed-Rules-for-Public-Comment.aspx>

Board staff is primarily working remotely, therefore, email is the most efficient mode of communication at this time. We appreciate your patience. Naturopathic.Medicine@obnm.oregon.gov

Please also take a moment to fill out the OBNM customer satisfaction [survey](#).

In Health;

Mary-Beth Baptista, J.D. (she / her)

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