

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 1:32 PM
To: MEDICINE Naturopathic * OBNM
Subject: OBNM CORRECTIONS AND CLARIFICATIONS to AANP message to Oregon Licensees: Changes to CE Rules Will Impact You. Deadline to comment 2/12.

Importance: High

The Board appreciates all of the licensees and interested parties who have submitted public comment to the proposed changes to the continuing education rules. I have made considerable efforts to individually reply to questions, concerns and comments received. However we received a notable amount of public comment in response to a message sent yesterday by AANP regarding the proposed rule changes (added below). Therefore, I felt it was imperative to send another message to all licensees, associations and interested parties with important clarifications and corrections in a group response.

Oregon Administrative Rules (OAR) currently, and the proposed rules maintain, approval for continuing education in three ways:

1. Enumerated list in OAR of Board pre-approved continuing education programs that do not require Board approval (aka "automatic approval")
2. Hosts of continuing education programs, that show proof of registration and attendance of an Oregon licensee, may apply to the Board for program approval (aka "Board approval")
3. Licensees may apply to the Board for approval for attendance of structured continuing education programs (e.g. webinars, out of state conferences, seminars) and self-directed activities (e.g. presenter, educator, research) NOT preapproved by rule (automatic approval), or approved by the Board (Board approval).

The AANP statements regarding the current CE approval rules, the proposed rule changes, and the impact of the proposed rules on licensees are misleading and incorrect as follows:

1) *The proposed changes would **exclude AANP from the list of pre-approved CE providers**...*

- AANP is not, nor has never been included as "preapproved provider." (entitled to automatic approval) See OAR 850-040-0210(4)
https://secure.sos.state.or.us/oard/viewSingleRule.action;JSESSIONID_OARD=qQOFUsYNwPQn56uQStu8MTdkyf8v8WleIxnzJ-kXETYHYaNyIbPI!1961848273?ruleVrsnRsn=292927

(4) Board pre-approved continuing education programs that do not require Board approval:

(a) Accreditation Council for Continuing Medical Education (ACCME)

(b) American Council on Pharmaceutical Education (ACPE);

(c) ~~The Federation of Naturopathic Medicine Regulatory Authority (FNMRA)~~ (not an accreditation agency, long standing error [2018] will be corrected)

(d) North American Naturopathic Continuing Education Accreditation Council (NANCEAC)

- AANP and OANP are valuable partners. However, associations serve the profession - while as a regulatory agency our charge is to serve the public and ensure public safety. Associations put on and approve valuable programming. However to serve their membership base, associations host programming and approve programs that are (correctly) prohibited by Oregon Administrative Rule. Specifically OANP and AANP are not pre-approved providers because they host and approve programming not allowed by rule as follows (in most relevant part):

https://secure.sos.state.or.us/oard/viewSingleRule.action;JSESSIONID_OARD=JtqKFOv7VKw5-n9z7Jd6m_qyzAhkk2kclvf7Ksk0ZSoWL0tpdUeD!-918603911?ruleVrsnRsn=292927

850-040-0210

(7) Continuing Education will not be approved for the following program areas:

- (a) Programs that are proprietary in nature, promoting exclusive services, companies or products
- ...
- (c) Business growth and development;
- (d) Medical or insurance billing practices;
- (e) Nonprofessional health related programs presented by a lay person(s) or directed to the general public;

2) *[The proposed rules] restrict **automatic approval** for naturopathic CE from **dozens of providers to only 10 entities**, which could paradoxically harm long-term proficiency in naturopathic medicine.*

- Currently, OAR 850-040-0210(4) lists (effectively) **three** continuing education accreditation entities entitled to “**automatic approval**” (see above)
- Proposed rule **expands** the number of pre-approved providers and accreditation agencies entitled to “**automatic approval**” from **three to EIGHT**. <https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf>

(1) Approved accreditation services, providers, and agencies

- (a) Accreditation Council for Continuing Medical Education (ACCME)
- (b) American Council on Pharmaceutical Education (ACPE),
- (c) **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) **f) Oregon Board of Pharmacy**
- (g) **g) Oregon Health Authority**
- (h) **h) Oregon Medical Board - Medical, Osteopathic approved education only**
- (i) **i) Drug Enforcement Administration**

- The proposed rule **does not list NUNM or OANP as preapproved** providers. The proposed rules allow NUNM and OANP to **apply for** continuing education program approval. <https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf>

3) *OBNM’s proposed rules eliminate all pathways to have AANP-hosted activities pre-approved for Oregon licensees. ...Under the proposed rules, you would need to submit individual approval applications for all AANP-approved CE (including webinars and the AANP Convention).*

- As noted in the January 24th, Board email sent to all licensees, associations and interested parties_ <https://www.oregon.gov/obnm/Documents/Rules/1.24%20Email%20PROPOSED%20CONTINUING%20EDUCATION%20RULES%20Clarifications.pdf>; based on data analysis and public comment, the Board advised in relevant part:
 - *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.**
- The public meeting agenda, posted on the Board website on Monday, Feb 5, <https://www.oregon.gov/obnm/Documents/Board%20Information/Public%20Session%20Agenda%202024.02.pdf> schedules a Board discussion of additional changes regarding CE program approval, including but not limited to:
 - Per 2023 CE data, the majority of Oregon licensees reported the majority of their CE hours from programs provided by NUNM, OANP and AANP for annual renewal. Discussion to change rule as follows:
 - (2) (a) Entities Eligible to Apply for Program Approval:
 - (i) National University of Naturopathic Medicine (NUNM)
 - (ii) Oregon Association Naturopathic Physicians (OANP)
 - (iii) *American Association of Naturopathic Physicians (AANP) - Annual Conference*

4) *OBNM's proposed rules eliminate all pathways to have ... AANP-approved CE activities pre-approved for Oregon licensees...[including] a wide range of activity hosts which includes many of your state and specialty associations, trusted partners, and integrative professional allies...*

- AANP is not currently a pre-approved provider per rule.
- AANP-approved CE activities are currently not pre-approved per rule.
- Providers of AANP- approved CE activities, that show proof of registration and attendance of an Oregon licensee, currently must apply to the Board for “Board approval.”
- Under the proposed rule *state and specialty associations, trusted partners, and integrative professional allies* may apply for accreditation from the expanded list of approved accreditation agencies, which includes CNME and NANCEAC
- Per the proposed rule, active 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. If less than 10 Oregon licensees attend, the licensee may apply individually for credit for the program attended.
 - The aforementioned Jan 24th email noted the Board will discuss and consider amending the rule to approve in-state live programs with remote participants.
 - The posted public meeting agenda schedules a Board discussion of additional changes regarding CE program approval, including but not limited to:
 - Active Oregon licensees who host a live, in-person, or *with synchronous remote participation*, structured continuing education program, in the State of Oregon, with minimum of ten (10) Oregon licensee registrants may apply for approval up to 30 days prior to the program.
 - Active Oregon licensees who host a live, in-person, or *with synchronous remote participation*, structured continuing education program, in the State of Oregon, with minimum of *five (5) Oregon licensee registrants may apply for approval up to 30 days prior to the program.*

- Active Oregon licensees who host a live, in-person, or *with synchronous remote participation*, structured continuing education program, in the State of Oregon, *may apply for approval up to 30 days prior to the program.*

5) *The proposed rules allow for automatic approval of more conventional medical CE providers, ...which could paradoxically harm long-term proficiency in naturopathic medicine.*

- The proposed rule **adds Council on Naturopathic Medical Education (CNME)** to the approved provider list, in addition to the currently listed North American Naturopathic Continuing Education Accreditation Council (NANCEAC)
- The added *conventional medical CE providers* **directly correlate to annually required CE** for (but not limited to) pharmacy, pain management, ethics, suicide prevention, cultural competency, substance abuse disorder (DEA registrants).
- Many of the added approved entities provide webinars / on-line offerings – **many free of charge.**
- The additional approved providers will **reduce the number of individual applications licensees will need to submit for approval.**

6) *[The proposed rules] create barriers that could limit your access to valuable educational resources and diverse perspectives in naturopathic medicine*

- In addition to all recited above:
 - Licensees will continue to have the opportunity to apply for CE approval for programs attended not preapproved by rule or approved by the Board for up to / all 32 hours of required education. (e.g. webinars, out of state conferences, seminars)
<https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf>
 - Licensees will continue to have the opportunity to apply for credit for self-directed activities. (e.g. teaching / presentations / research / writing etc.)
<https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf>

For the greatest level of transparency, Board staff posted the *draft minutes* from the December public board meeting outlining the discussion and deliberation that lead to the proposed rules:
<https://www.oregon.gov/obnm/Documents/Board%20Information/Public%20Session%20Draft%20Minutes%202023.12%20for%20Website.pdf>

The Board will accept public comments through February 12. Again, for transparency, and preparation for the Monday Board meeting, staff will post on the website all public comments received and any responses provided at / by noon on Friday, Feb. 9. <https://www.oregon.gov/obnm/Pages/Board-Meetings.aspx> The remainder of the public comments will be posted on Monday.

The Board members and I encourage all interested to attend either in person or via conference call the public session of the bi-monthly Board meeting on Feb.

12. <https://www.oregon.gov/obnm/Documents/Board%20Information/Public%20Session%20Agenda%202024.02.pdf>

Thank you and please do not hesitate to contact me with any further questions.

----- Forwarded Message -----

From: American Association of Naturopathic Physicians <communications@naturopathic.org>

Date: On Wednesday, February 7th, 2024 at 11:56 AM

Subject: OREGON LICENSEES: Changes to CE Rules Will Impact You. Deadline to comment 2/12.

[View as Webpage](#)



Dear AANP Members who are Oregon licensees,

The Oregon Board of Naturopathic Medicine (OBNM) has proposed [dramatic changes](#) to its CE rules that could significantly impact your ability to access high-quality, AANP-approved continuing education (CE). We are deeply concerned about these proposed changes and urge you to take action before the **February 12th deadline**.

Background:

OBNM's proposed rules eliminate all pathways to have AANP-hosted or AANP-approved CE activities pre-approved for Oregon licensees. AANP hosts 75 hours of CE for our members, between monthly webinars and the AANP Convention. We additionally approve over [600 hours of CE](#) from a wide range of activity hosts which includes many of your state and specialty associations, trusted partners, and integrative professional allies. As drafted, the proposed rule would make the OBNM the **only regulatory board in the country that does not accept AANP-approved CE, and that does not allow the AANP any pathway to get AANP CE pre-approved.**

Here's what's at stake:

- **Increased burden and uncertainty:** Under the proposed rules, you would need to submit **individual approval applications** for all AANP-approved CE (including webinars and the AANP Convention). This adds unnecessary complexity and uncertainty to your CE planning, and more administrative time to your already overburdened schedule.

- **Reduced access to trusted resources:** The proposed changes would exclude AANP from the list of pre-approved CE providers, despite our national reputation for excellence and rigorous standards. They create barriers that could limit your access to valuable educational resources and diverse perspectives in naturopathic medicine.
- **Potential impact on naturopathic expertise:** The proposed rules allow for automatic approval of more conventional medical CE providers, while restricting automatic approval for naturopathic CE from dozens of providers to only 10 entities, which could paradoxically harm long-term proficiency in naturopathic medicine.

We care deeply about your professional development and access to high-quality CE. That's why we are asking you to **raise your voice** and ask OBNM to amend the proposed rules to include the AANP to the list of approved CE providers.

What you can do:

1. [Click here to submit a comment to OBNM](#) by **February 12th**
2. Keep your message simple and focused: State that you are an AANP member and Oregon licensee, and urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies."
3. Share this message with your colleagues and fellow Oregon licensees!

Please don't hesitate to contact me if you have any questions at executive@naturopathic.org. Together, we can ensure that AANP members who hold Oregon licenses continue to have reasonable access to the high-quality, trusted CE you deserve.

Sincerely,



Laura Farr
Executive Director

Submit Your Comment to OBNM

American Association of Naturopathic
Physicians
naturopathic.org



American Association of Naturopathic Physicians
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[Unsubscribe khindman@healingdragon.net](mailto:khindman@healingdragon.net)



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;

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