

CRUMPLER Robin * OBNM

From: Dr. Amelia Cohn <Dr.AmeliaRCohn@proton.me>
Sent: Friday, February 9, 2024 3:18 PM
To: MEDICINE Naturopathic * OBNM
Subject: AANP CE approval

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I am writing to express my concern about proposed rule changes by the OBNM that would NOT pre-approve AANP CE for Oregon Naturopathic doctors. My first question is WHY would you do this? This rule change makes absolutely no sense. This is the Oregon Board of NATUROPATHIC Medicine, and we need CE credits from the American Association of NATUROPATHIC Medicine. Please do not allow these new rules to pass. IT is difficult enough to get quality, cost effective naturopathic education, please do not make it harder for us. It will drive NDs out of Oregon. It will decrease the quality of naturopathic care available to patients and it will decrease the credibility of naturopathic providers in all of Oregon. We do not need to become satellite providers (Like NPs and PAs) of the MD profession, which is what your proposed rule changes will do to us. NDs need to remain Naturopathic, and we require quality continuing education to remain naturopathic.



Dr. Amelia R Cohn
Naturopathic Physician
The Center for the Centering of Consciousness

[541-588-0133](tel:541-588-0133) | mynaturopath.net |

dr.ameliarcohn@proton.me

"I am not what happened to me, I am what I choose to become." -- Carl Jung

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CRUMPLER Robin * OBNM

From: Marnie Loomis <info@marnieloomis.com>
Sent: Friday, February 9, 2024 6:19 PM
To: MEDICINE Naturopathic * OBNM
Subject: Concern about proposed changes to CE approval process

Dear OBNM Board Members,

I am very concerned about the proposed changes to the CE approval process because **I think it will add even more cost to the consumer and will limit the creation of new ND-specific CE.** As naturopathic physicians, we have enough uphill battles in business as it is. Please don't add to the stress and expense of being a ND practicing in Oregon.

In recent years, I've been delighted with the increased access to different types of naturopathic specific CE options available online, especially through sites like NaturopathicCE. The online classes are extremely high quality and offer much value. They are a refreshing departure from the limited CE sources available before. I've appreciated the vast diversity of naturopathic topics available at relatively low cost.

As the former Director of Continuing Education at NUNM, I know how much NUNM and OANP both depend on the revenue generated by offering their own CE. As NUNM transitioned into an online digital marketplace of streamable CE content, this was a HUGE point of contention for OANP. They did not want the competition in such a limited market.

But the CE licensing requirement does not exist to keep organizations like OANP and NUNM in business. The CE requirement is about keeping practicing NDs current and informed so that they can provide the best care possible. The result of more competition was an overall improvement for licensed NDs. In the years following, licensed NDs have continued to benefit from the creation of other CE sources as well.

I'm concerned that the proposed changes to the CE approval process will give these two entities an unfair and unethical advantage in this limited market. **How can we be sure they wouldn't block the approval of CE opportunities that directly competed with their upcoming conferences and online offerings?**

In addition, the proposed changes will significantly increase the cost and bureaucracy involved in producing naturopathic-specific CE, which will in turn increase the cost to the consumers and limit their access to a diverse amount of offerings.

I urge the board to consider the importance of pre-approved online CE opportunities intended for naturopathic doctors, especially for specialized categories which pose the strictest requirements for Oregon licensees.

As an additional note, I'm concerned about the stability of NUNM as an organization. Is it wise for the OBNM to limit such an important function to an organization that is experiencing so much transition? I love NUNM, I do. But these last few years have not been kind.

I appreciate that you need to streamline your workflow. I hope you can find a way to do so that doesn't have such a negative impact on ND licensees.

Thank you for your time and consideration.

Warmest regards,

Dr. Marnie Loomis ND

503 544-7044

info@marnieloomis.com

in PORTLAND @ the Blyss Chiropractic Clinic

in NEWBERG @ the Clover Clinic

CRUMPLER Robin * OBNM

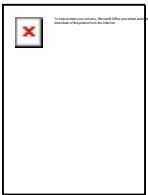
From: Samantha Brody <drbrody@healthypdx.com>
Sent: Friday, February 9, 2024 7:35 PM
To: MEDICINE Naturopathic * OBNM
Subject: proposed rule changes

FWIW I think the changes are totally reasonable.
Not sure you're even having people who are in favor of the changes respond, but know we're out here.

Thank you for looking out for safety as a priority.

-Dr Samantha Brody

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My book [Overcoming Overwhelm](#) is available wherever books are sold!
www [DrSamantha.com](#) PDX office [Evergreen Natural Health Center](#)
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CRUMPLER Robin * OBNM

From: rebecca.krisko@gmail.com
Sent: Saturday, February 10, 2024 4:55 PM
To: MEDICINE Naturopathic * OBNM

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I'd love to make one suggestion regarding the new rules.

I have not been in any of your meetings and do not really know what you're trying to solve for, but considering the severity of the pushback these new rules are receiving, could you either create a "pathway to becoming an approved CE provider" or a "set of standards" that CE providers would need to meet to have the privilege of submitting for approvals to the OBNM?

I am an OR licensee and my only agenda would be to preserve access to CE that will make meeting licensing requirements easily accessible and achievable. Yet, I can't understand how divergent some of the CE programs can be in our field and how difficult your job must be.

Hope this comment is somehow helpful. I'm guessing you've probably already considered all of these ideas from others, but thought I'd write just in case you hadn't.

Just another data point. I'm currently in limbo whether to register for the AANP conference because I'm unsure whether their hours will be approved or if it will create a bunch more work for me to get my CE that way.

Thanks for reading and considering.

Rebecca Krisko

CRUMPLER Robin * OBNM

From: Rosetta Koach <rkoach@rosettakoach.com>
Sent: Saturday, February 10, 2024 1:44 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE opportunities for Oregon ND licensees

To OANP

I don't agree with the proposed changes. I want access to more pre-approved opportunities that are specifically intended for naturopathic doctors, not fewer. Please amend these changes so that there continues to be inclusive and diverse pre-approved CE opportunities for Oregon ND licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors. I also want access to more pre-approved opportunities offered in Traditional Naturopathic Medicine by Qualified Professionals teaching use of Herbal Medicine, Homeopathy, Physical Medicine, Food as medicine, Physical Medicine (Massage, Manipulation, Exercise Therapeutics, Therapeutic Machines, Hydrotherapy, IV Therapy), Psychological Counseling.

Work load can be cut down by continuing to approve educators and courses that have been vetted and approved in prior years and focusing on new educators and courses as they apply for approval.

Thank you,
Rosetta Koach, LMT, ND
503-628-6357

CRUMPLER Robin * OBNM

From: Vanessa Pavey <vanessapavey@gmail.com>
Sent: Friday, February 9, 2024 10:43 PM
To: MEDICINE Naturopathic * OBNM
Subject: Changes to AANP-approved CE

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Forcing extra work on already taxed Naturopaths is horrible, and I'm saddened for my OR colleagues if the proposed rules to exclude the AANP on the list of approved CE providers is not amended.

I depend on the AANP for my CEs every year. If my practice and license was in OR, this change would cause me an extreme amount of stress. So I am raising my voice to this injustice.

Very shameful.

Vanessa Pavey, ND
Bastyr graduate 2013
Grateful to be registered in MN

CRUMPLER Robin * OBNM

From: Angela Cortal <angelacortal@gmail.com>
Sent: Saturday, February 10, 2024 3:00 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: My public comment re: OBNM PROPOSED CONTINUING EDUCATION RULES

You don't often get email from angelacortal@gmail.com. [Learn why this is important](#)

Hello OBNM,

I appreciate the transparency and communication you all have been providing us licensees. I figure since I know you all are getting a mountain of flack right now, I'll start my message off on a nice note.

After even more time Mary-Beth has spent with myself very generously, and again emailing all us licensees, I would like to update my earlier public comments, so I am attaching it to my original.

1) I would be in support of adding AANP, OANP, and NUNM to the list of Approved accreditation services, providers, and agencies. I hadn't known the rationale for why they were not on the Approved list to begin with, and from what I am hearing, I am in disagreement.

I have had extensive involvement with conferences put on by the AANP, NUNM, and OANP, both as a presenter and event volunteer (I'm starting my third year on OANP's Board of Directors). This is to say I am very familiar with all of these organizations and their events. They may host events that are not allowed to be approved by CE (such as a sponsored "lunch and learn"), but every single organizer I have worked with is extremely cognizant of these requirements and meticulously follows these rules.

Your statement seems to imply that these organizations on the whole disregard or are ignorant of these rules and cannot be trusted to have their CE be automatically approved. And on this point I disagree.

Or does this mean that they (AANP, OANP, NUNM) can't be included because every single event put on by every currently-listed Approved agency does not ever have any sponsored talks at any events? I ask because, while I don't believe I've attended an Oregon Medical Board-approved event, I have never attended a "conventional" medical conference that did not also have sponsored "lunch and learn" sessions.

2) I completely misunderstood several of the key points from earlier communications, so a lot of my earlier points feel resolved.

I do still believe that our more extensive CE programs will see a down-tick in registration, as licensees wrap their minds around these changes. Whether this hesitation to register for events that soon will only be approved after the fact will have a minimal or devastating impact to our small training providers remains to be seen.

Thank you again for your time, and I look forward to a more functional license renewal platform :)
Angela Cortal

On Fri, Jan 26, 2024 at 1:07 PM Angela Cortal <angelacortal@gmail.com> wrote:
Hello OBNM,

I want to first say that I have read both emails and all attached documents in their entirety.

I have listened to (and understand) all of your points. I was in attendance at the recent OANP legislative committee update meeting, and I thank you Mary Beth Baptista for your time and attention you

have spent in communicating and answering what are surely many, many questions and concerns from licensees.

I was the one who asked the question during the meeting. Based on where the conversation went, it didn't seem that further questions on my part would be a fruitful use of everyone's time.

I fully understand the OBNM's position, reasons, and priorities. The financial infeasibility of the current CE approval structure is quite apparent. Whoever first created such broad and overly generous parameters for approval certainly did not have the OBNM's best interest in mind.

After educating myself as much as I possibly can with all your materials provided, I continue to vehemently disagree on one point.

For all the positives laid out for both the OBNM and licensees, there will be some negative outcomes for some licensees. Some of whom are also small businesses (so I refute the claim that no small businesses will be impacted), some of whom are licensees seeking educational opportunities.

I of course hope that the many positive outcomes of these changes will make the negative outcomes to be experienced by some worth it in the end.

Because it seems that no one yet has provided any input regarding these anticipated detrimental impacts as a result of these rule changes, I would like to share my view, experience, and ideas.

For context, I am an ND in Oregon. I have been practicing in Oregon since 2012, and I have been submitting my own educational courses for approval for the last few years (since 2021 I believe).

The types of CE I have offered have varied greatly. I have taught rooms of hundreds of people for an hour, and I have taught a single licensee for 50+ hours. With these proposed rule changes, most of the education I offer will no longer be able to be pre-approved.

I do understand that I (and my students) will be able to continue to submit hours for CE approval to OBNM for 30 days following each event. With this being said, the inability to pre-approve hours will have significant negative outcomes.

I primarily focus on (very) small group, long-format training. By and large, these events max out at 4 participants, and usually span 2 to 6 days of educational training. I have focused on and refined the format of my courses such that they just will not be able to fit the proposed pre-approval criteria.

I would estimate that 95% of my past students are NDs, and of those probably around 85% are Oregon licensees.

And they all expect my courses to be pre-approved.
They just do.
It's just a standard at this point.

If you had been a part of the many dozens or hundreds of conversations my assistant and myself have had with these folks, you would not hesitate to agree with me on this point.

To suddenly switch from pre-approved courses to, "you can/we will submit this course for OBNM approval after the fact" is a huge perspective shift. Up to and until there is a general mindset catch-up in our profession (when we all no longer expect pre-approval for courses), myself, my fellow Oregon ND colleagues who instruct similar courses, and our future students will be adversely impacted.

As a result of these proposed rule changes, I believe that for many of my prospective students, waiting until after the course to see what CE gets approved will seem like too much of a gamble. Courses with no students will cease to exist.

I am not just fretting about myself. Believe me, I have more than enough to busy myself with in my career. But I do foresee a change in our CE landscape here in Oregon. Yes, many doors will open, but some will close (and ironically, this will cause a shift towards more education taught by other professionals, and less by NDs themselves).

I am submitting my public comment to explain this because I have not yet seen any acknowledgement of this point yet.

I'm not saying that rules should stay the same.
I understand how unsustainable they are for the OBNM.
I also realize that the OBNM is a regulatory body whose focus is on licensees and the public, not CE agencies and instructors.

What I am hoping for is that there will be some avenue for us small-potatoes instructors to continue to get pre-approval, some happy middle ground for everyone.

And believe me, I would be ecstatic if I could stop bothering you all and obtain CE pre-approval elsewhere. Unlike Arizona, here in Oregon our member association doesn't approve CE. And the \$10,000 price tags I've found so far from some of those 9 agencies on your list is just not within my budget.

What I would like to see is more consideration towards Oregon NDs seeking CE pre-approval. We are your licensees, practicing here in Oregon. We're not the "significant number of out of state and for profit CE program providers [who] use our approval process to avoid the costs and more rigorous requirements of going through the many CE accreditation services." But it feels like we're being lumped into that group, with nowhere else realistic to turn to for course

pre-approval.

I suggest that a fee structure be created, instead of only focusing on these rule change details around CE format (virtual/ in-person), number of attendees, etc. So that in addition to NUNM and OANP, Oregon licensees can continue to submit for CE pre-approval, subject to the fee structure of your choosing (less than \$10,000 please).

Maybe you all choose a tiered structure, based on the criteria that's already being discussed (virtual vs. in-person, number of anticipated attendees, location of event, etc). You're the OBNM. It's your call.

I hope that you can hear my passion and understand my position. I am very sorry that you did not hear from any of us who will be impacted by these rule changes earlier.

Thank you all for your time and consideration,
Angela Cortal ND

CRUMPLER Robin * OBNM

From: Christina Hinchcliffe <doctorhinchcliffe@gmail.com>
Sent: Sunday, February 11, 2024 9:34 PM
To: MEDICINE Naturopathic * OBNM
Subject: AANP approved accreditation with OBNM

To Whom It May Concern:

I am an AANP member and Oregon licensee, and urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies."

Thank you,

Dr. Christa Hinchcliffe ND

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CRUMPLER Robin * OBNM

From: Lindsay Baum <drbaum@grainintegrativehealth.com>
Sent: Sunday, February 11, 2024 11:15 AM
To: MEDICINE Naturopathic * OBNM
Subject: AANP approved CE

Please add the AANP to the list of organizations that can pre-approve CE. As a state leading primary care in naturopathic medicine, we should not be reducing the financial capacity of an organization that offers us legislative leadership nationally and in Oregon. Adding the AANP ensures that Oregon providers do not need to increase our administrative duties to get CE approved- our state has an inordinate amount of paperwork through insurers when compared to other states.

Thank you for your consideration.

Sincerely,
Lindsay M Baum, ND

This response may contain errors. Please let me know if you have any questions or concerns.

CRUMPLER Robin * OBNM

From: Elspeth Seddig <drseddig@yahoo.com>
Sent: Sunday, February 11, 2024 1:25 PM
To: MEDICINE Naturopathic * OBNM
Subject: AANP CE

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Hello,

I am not an Oregon licensee but I think it is unfair to now have an added step for OR licensees. I am an AANP member and I urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies."

Elsbeth G. Seddig, N.D.

Doctor of Naturopathic Medicine

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CRUMPLER Robin * OBNM

From: Paul Reilly <paulreillynd@gmail.com>
Sent: Sunday, February 11, 2024 10:15 AM
To: MEDICINE Naturopathic * OBNM
Subject: AANP CME

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Please allow the AANP to provide reapproved Oregon CME credits. I use the AANP conferences to get most of my CME and depend on their lectures to be credited towards my total hours. There does not seem to be any good reason why the AANP is no longer automatically accepted. If there is a problem, please help us identify it so this can be resolved.

Paul Reilly,ND

CRUMPLER Robin * OBNM

From: Marie Barrera <marie.barrera@bastyr.edu>
Sent: Sunday, February 11, 2024 11:13 PM
To: MEDICINE Naturopathic * OBNM
Subject: Add to AANP list

I am an AANP member and Oregon licensee, and urge OBNM to add AANP to the list of Approved accreditation services, providers, and agencies.

Thank you.

Marie Barrera, ND, CCN, MA Ed
BASTYR UNIVERSITY

CRUMPLER Robin * OBNM

From: Dr. Meaghan Dishman <mdishman@drmeaghandishman.com>
Sent: Sunday, February 11, 2024 3:03 PM
To: MEDICINE Naturopathic * OBNM
Subject: Approve AANP

I have been in clinical practice since 2005 and am a member of the OANP and AANP - Naturopathic Doctors in Oregon already have more required CEs / year than most other medical professions.

OBNM - please do right by Naturopathic Doctors, and add AANP to the list of Approved accreditation services, providers, and agencies.

Simple -Do the right thing.

In Joy,
Dr. Dishman

Dr. Meaghan Dishman ND, LAc, MSOM
Functional Medicine Naturopathic Doctor + Licensed Acupuncturist
✧ Discover life changing wellness ✧

INSPIRED HEALTH: Integrative + Functional Medicine Center
550 SW Industrial Way
Building 2, Suite 100
Bend, OR 97702
(541)312-9838
<http://inspiredhealthmed.com>

CRUMPLER Robin * OBNM

From: April <lasagna360@gmail.com>
Sent: Sunday, February 11, 2024 7:45 PM
To: MEDICINE Naturopathic * OBNM
Subject: Brief feedback on AANP CE

As an ND licensed in Oregon, I am grateful that the OBNM is looking out for the integrity of naturopathic education, and not approving AANP classes that are heavily focused on supplements/companies. I hope the same would go for pharmacy focused classes as well (nevertheless we're required to take them). Tricky ground to navigate. In light, April Gilliom

CRUMPLER Robin * OBNM

From: Kristin Wing <drkristinwing@gmail.com>
Sent: Sunday, February 11, 2024 12:47 PM
To: MEDICINE Naturopathic * OBNM
Subject: Comment

Hello,

I am an aanp member and oregon licensed ND. I am writing to ask that AANP be added to the approved "accreditation services, providers and agencies" to maintain access to their courses for approved CE.

Sincerely,

Kristin Wing

CRUMPLER Robin * OBNM

From: Kelley Reis <drkelleynd@gmail.com>
Sent: Sunday, February 11, 2024 1:19 PM
To: MEDICINE Naturopathic * OBNM
Subject: COmment on proposed CE requirements

Hello there! I am writing to submit my comment regarding the proposed rule changes to CE approval that SEVERELY limit the approval process and place an enormous burden on license holders in the state of Oregon. For example, AANP has been a trusted naturopathic leader for a very long time including and offer immense number of hours of CE yearly including their yearly convention. Many of us utilize their resources for CE - both in person and webinars as they are robust and informative.

This is not just about AANP but it will limit our ability to get CE from verified, reputable resources unless specifically listed as OBNM verified. I understand we can submit CE requests.

The amount of CE required is rigorous already - to make it even more challenging for Oregon license holders to gain knowledge in the potential vast trusted sources outside of OBNM's narrow approved sources is disheartening.

Sincerely,
Kelley Reis

Dr. Kelley R. Reis
Naturopathic Physician

Raleigh Natural Wellness and Liberty Natural Wellness
www.raleighnaturalwellness.com
www.libertynaturalwellness.com

CRUMPLER Robin * OBNM

From: laur.menk.otto@gmail.com on behalf of Laurie Menk Otto ND
<lauriemenkottond@gmail.com>
Sent: Sunday, February 11, 2024 6:32 PM
To: MEDICINE Naturopathic * OBNM
Subject: I support CE changes

I know that you all have been spammed with emails protesting CE changes - this is a note in enthusiastic support of these changes.

:) Thanks for your work.

--

Laurie Menk Otto ND, MPH
Reconstructed Wellness
936 SE Ankeny Street
Portland, OR 97214
503-232-3215

CRUMPLER Robin * OBNM

From: Kristin Barnes <drbarnes@meridianpassagewellness.com>
Sent: Sunday, February 11, 2024 9:33 AM
To: MEDICINE Naturopathic * OBNM
Subject: OBNM CEU accreditation changes

You don't often get email from drbarnes@meridianpassagewellness.com. [Learn why this is important](#)

Good morning,

I'm an ND/LAc with inactive licenses in Oregon. I currently practice in Washington but obtained my license in Oregon in anticipation of moving my practice to Bend. I have not yet moved, however, still maintain the inactive OR license which requires me to fulfill the CEU requirements regardless. As such, these changes to the CEU accreditation will greatly impact my ability to maintain this licensure. The cost to maintain enough CEUs for two licenses from separate sources will preclude this.

Currently, with AANP being accepted, I am able to obtain my CEU for both Washington and Oregon. This happens through credits obtained almost solely from the AANP with a few exceptions that I obtain through Oregon resources. Changing your requirements will double what is already a large financial burden (in addition to the cost of a license that I am not actually using). Bottom line is that I will have to deactivate my licenses entirely (both ND and LAc - there's no point retaining just one) unless I am able to obtain CEUs at an affordable price.

The CEU requirements are already a significant burden although I understand the need for continuing education. There has to be a way to ensure appropriate education without undue burden to the individual provider (for cost, planning, tracking, etc) and those who are willing to do the work to create CEUs.

I urge you to consider other, less restrictive options so that the complexity of the CEU playing field and financial burden is not increased to a point where people simply opt out.

Thank you for your time.

Kind regards,

Kristin Barnes

--

Kristin Barnes, ND, LAc
Meridian Passage Wellness



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Port Townsend, WA 98368
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CRUMPLER Robin * OBNM

From: Joan Waters <jdwaters777@gmail.com>
Sent: Sunday, February 11, 2024 11:07 AM
To: MEDICINE Naturopathic * OBNM
Subject: Please rethink your proposed new CE requirements

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OANP is not the organization that should be allowed to dictate whether AANP CEU credits are approved as valid. We NDs are busy and don't have time to do tasks that are unnecessary. I adamantly oppose your proposed changes to CE requirements.

I am not an OANP member, don't hold an Oregon license, and after this, don't want to. I am a concerned ND, advocating for my colleagues who do hold Oregon ND licenses.

The benefit of any proposed change needs to outweigh the cost. The cost of this change is exorbitantly high, given that it will require more time be devoted to the administration of CE requirements in each practice.

Sincerely,

Joan Waters, ND
Practical Health Solutions, LLC
1101 E Elizabeth Street Fort Collins, CO 80524 by appointment only
Mailing: 148 Rainbow Dr #4807 Livingston, CO 77399
970-482-2010

fax 888-835-3244

CRUMPLER Robin * OBNM

From: Julie Brush <drjuliebrush@gmail.com>
Sent: Sunday, February 11, 2024 3:20 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: proposed changes to CE rules for Naturopathic Physicians

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Dear Members of the Board,

I am very concerned about the proposed changes to the CE rules that will create a barrier to accessing pre-approved naturopathic CE for many Oregon licensees, leading to unnecessary uncertainty, risk, restriction of options and administrative burden for those licensees.

As a ND who is currently licensed to practice naturopathic medicine in 6 US states, I depend upon the fact that most of my CEs meet the requirements of multiple states. These proposed changes would create a substantial burden to meeting the CE requirements annually, to the point where I would have to consider whether continuing to maintain my OR licensure would be worth the extra effort.

I have reviewed the 2/9/24 letter from the AANP to OBNM and am in support of the changes proposed to the adoption of 850-040-0220 by the AANP in that letter.

Sincerely,
Dr. Julie Brush

Julie Brush, ND

Amen Clinic Los Angeles | 5363 Balboa Blvd., Suite 100 | Encino, CA 91316

O: 818-479-4400 | F: 818-305-3779 | E: docjbrush@amenclinic.com

Mauli'Ola Medical | 83 Maikai Street, Hilo HI 96720

O: 503-877-9178 | F: 866-733-1902 | E: drjuliebrush@gmail.com

"The highest compliment I can receive is a vote of confidence by a referral."

CRUMPLER Robin * OBNM

From: Mitchell Bebel Stargrove, ND,LAc <drmitch@wellspringofhealth.com>
Sent: Sunday, February 11, 2024 1:16 PM
To: MEDICINE Naturopathic * OBNM
Subject: proposed changes to CE rules

Hello,

I am writing as an ND licensed in Oregon, and as a member of the AANP, to express my strong opposition to the proposed rule changes regarding the continuing education approval process.

In particular, omitting the AANP from the pre-approved list of CE providers would be a serious mistake and do harm to both the naturopathic physicians of Oregon and to our patients and communities.

I request that the OBNM add the AANP to the list of "Approved accreditation services, providers, and agencies."

Sincerely,
Mitchell B. Stargrove, ND, LAc

CRUMPLER Robin * OBNM

From: Kelly Parcell <drkparcell@naturemedclinic.com>
Sent: Sunday, February 11, 2024 2:34 PM
To: MEDICINE Naturopathic * OBNM
Subject: Remove access to CE for NDs in Oregon

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To those at OBNM,

As a Naturopathic Doctor who has been attending conferences to fill my licensing CE for 24 years, I am greatly concerned and opposed to this recent measure to limit CE recognition from and through the AANP, our very own national association. This makes absolutely no sense to me.

Our doctors need to have CE appropriate to our naturopathic principles and training. The AANP is the absolute best source for these CE's. Not only that what organization provides the depth and breadth and expertise in our medical practice to provide not only CE directly but also be able to vet quality CE from outside sources and approve of them on behalf of our doctors?

This measure also concerns me as the OBNM board is a core establishment in the validating of our medical practices and CE, so creating this uncertainty may expose our profession to entities that may attempt to reduce validity of our resources and naturopathic expertise.

I am curious why this measure has come to be and if the long-term outcomes of this have been considered. The ripple effect of this across the nation in threat to access of trusted resourced CE for our doctors concerns me greatly. Has this been considered?

I am opposed to the proposed changes the OBNM CE rules as they will significantly impact our ability to access high quality AANP-approved continuing education. The AANP has secured standards for CE approvals and offerings and are experts in our education and training.

Sincerely,

Kelly Parcell, ND

Owner/Doctor
NatureMed Integrative Medicine
Boulder, CO
naturemedclinic.com
integrativepracticeconsultant.com
Check out my [book](#).

CRUMPLER Robin * OBNM

From: Timothy Miller <timothymillernd@gmail.com>
Sent: Monday, February 12, 2024 11:53 AM
To: BAPTISTA Mary Beth * OBNM; MEDICINE Naturopathic * OBNM
Subject: Petitions with Signatories
Attachments: Petition #2 - Signatories.pdf; Petition #1 - Signatories.pdf

Hi Mary-Beth and Robin,

Attached are the two petitions that I mentioned in my public comment with respective signatories. Petition #1 has 205 signatures and Petition #2 has 119 signatures. We urge the board to reconsider the proposed rule changes; there are other solutions available that can benefit everyone while still meeting the board's needs.

Could you kindly confirm receipt of this email?

Thank you!
~Tim

Dr. Timothy Miller, ND, MAc, LAc, RA

CRUMPLER Robin * OBNM

From: Tediana Torrens <tedianatorrens@gmail.com>
Sent: Monday, February 12, 2024 10:15 AM
To: MEDICINE Naturopathic * OBNM
Subject: AANP CE

Good morning,

I am both an Oregon Licensee and an AANP member and I would like to urge OANP to include AANP in the list of approved accreditation services, providers and agencies. They have consistently provided high quality, consistent CE opportunities for NDs, and CEs that are more specific to the ND community. I fear that by excluding AANP from this list will result in an overall negative impact to the field of naturopathic medicine as a whole, as most pre-approved CE providers will be conventional in nature.

Thank you for your time and consideration regarding this matter.

--

Tediana Torrens, ND

Pronouns: she/her

714.331.5798

CRUMPLER Robin * OBNM

From: Veronica M Gayoso <veronica.mgayoso@bastyr.edu>
Sent: Monday, February 12, 2024 7:15 PM
To: MEDICINE Naturopathic * OBNM
Subject: AANP Continuing Education

You don't often get email from veronica.mgayoso@bastyr.edu. [Learn why this is important](#)

Good evening,

I am an AANP member and future Oregon license. I urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies". The AANP has a national reputation for excellence and rigorous standards. This will create barriers that could limit access to valuable educational resources, therefore limiting the quality of our care for patients.

Thank you for your consideration.

Kind regards,

--

Veronica M. Gayoso, MPH, NMS-1
Bastyr University - Washington

CRUMPLER Robin * OBNM

From: Brigid Crowe, ND <brigidcrowend@gmail.com>
Sent: Monday, February 12, 2024 7:15 PM
To: MEDICINE Naturopathic * OBNM
Subject: Approval of AANP

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I am an AANP member and Oregon licensee, and urge OBNM to add AANP to the list of Approved accreditation services, providers, and agencies.

Thank you.

--

Dr. Brigid Crowe

Naturopathic Primary Care

541.708.0066

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CRUMPLER Robin * OBNM

From: Michael Traub <traub.michael@gmail.com>
Sent: Monday, February 12, 2024 9:10 AM
To: MEDICINE Naturopathic * OBNM
Subject: list of "Approved accreditation services, providers, and agencies"

You don't often get email from traub.michael@gmail.com. [Learn why this is important](#)

Dear OBNM:

I am an AANP member and Oregon licensee (inactive), and urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies."

I also host an annual CE conference "Hawaii Doc Talks" and the omission of AANP as an approved provider would could harm to this unique CE program and the attendees.

Thank you for considering my request.

Michael Traub ND

CRUMPLER Robin * OBNM

From: Noel Peterson <dr.peterson@oregenmed.com>
Sent: Sunday, February 11, 2024 10:15 AM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed CE rules: in support

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Hello OBNM,

I recognize the challenges of CE approval, and also recognize the potential for back-door abuse by non-accredited CE providers. In my 45 years of active practice here in Oregon, I have been concerned by the number of CE providers and what must be an impossible difficult monitoring of their content.

I have read through the posted draft comments from the December 11, 2024 CE approval and I would like to express my appreciation for the thoughtful process, and inform you that I agree with the intent to take the OBNE out of the highly technical and time consuming CE accreditation business.

I support your proposed rules and appreciate your open and deliberative process.

Thank you

,

Noel Peterson ND



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503-636-2734

320 Oswego Pointe Dr., Lake Oswego, OR 97034

OregonRegenerativeMedicine.com

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CRUMPLER Robin * OBNM

From: Elizabeth Burch <burch52@gmail.com>
Sent: Monday, February 12, 2024 11:10 AM
To: MEDICINE Naturopathic * OBNM
Subject: Comments on change to CE Approval Process

[You don't often get email from burch52@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Oregon Board of Naturopathic Medicine,

First, thank you for your ongoing service to the naturopathic medicine practice in Oregon. I appreciate your hard work.

I support you in working to make the CE Approval Process more clear and efficient.

I get most of my CE hours each year from ACCME approved CE activities. I do get some of my CE hours each year from Naturopathic CE, especially pharmacology hours. I have in some years gotten CE hours from NUNM and OANP.

My main disappointment with the new proposed CE process is that I will no longer be able to get CE hours, especially pharmacology hours from Naturopathic CE. I have found their pharmacology CE to be exceptionally good. They also have provided activities with a high number of pharmacology hours making it very convenient to get my pharmacology CE hours with a single activity or at most two activities. ACCME activities can be hard to claim pharmacology hours for as they are not specific in the activity how many hours are pharmacology.

If the changes to the CE Approval Process are approved, I will need to find an approved provider that offers pharmacology hours. A bit of an inconvenience that I won't be able to use Naturopathic CE for CE hours in the future. I hope that I can find another approved provider that offers pharmacology activities.

Respectfully yours,
Elizabeth Burch
OR ND license #664

CRUMPLER Robin * OBNM

From: Anya Warren <acwarren2018@gmail.com>
Sent: Monday, February 12, 2024 10:30 AM
To: MEDICINE Naturopathic * OBNM
Subject: Concern about CE's

You don't often get email from acwarren2018@gmail.com. [Learn why this is important](#)

Hello OBNM,

It has been brought to my attention that there will be changes to your acceptance of CE's. I currently AANP member and Oregon licensee, and urge you the OBNM to add AANP and ONCANP to the list of "Approved accreditation services, providers, and agencies."

These two associations are where I get most of my CE credits annually. I would also like to say - by not including them as approved, May push me to look elsewhere to obtain my license. I live and work out of state and have kept my lic. in Oregon for 16 years.

Sincerely,
Anya Warren

CRUMPLER Robin * OBNM

From: Stefani Hayes <shayes@kwanyinhealingarts.com>
Sent: Monday, February 12, 2024 10:12 AM
To: MEDICINE Naturopathic * OBNM
Cc: Khivan Oberoi, ND
Subject: Re: OBNM PROPOSED CONTINUING EDUCATION RULES: Clarifications and Projected/Positive Impact on Licensees. Public Comment Open to Feb 12

Thank you for all the information on this.

My comment is the following:

My colleague (Dr. Khivan Oberoi, ND) and myself have recently started a fertility fellowship program (including live in-person components and virtual components). It is meant to support new graduates in better understanding the nuances of fertility patient management and active case support. It is designed for 10 students or less at a time, for a direct support model. We believe this is invaluable to the profession. My concern in relation to this ruling is the following - **We will not have at least 10 Oregon participants, as that is our cap. We have so far had fellowship groups of 4 and 5. Please consider supporting smaller CE programs by your local providers. Also, not all ND graduates are interested in our program live in Oregon. Some are in other states. They would come in town for the in-person component, but they are out of state for convenience on the virtual aspects. Depending on participant feedback, we also want the option to consider offering a "live" virtual only fellowship to those out of state who can't afford the travel. This ruling would be detrimental to our opportunity to provide that to students out of state who also need CE.**

We are also creating a virtual only fertility course to fill the lack of training that Bastyr and other naturopathic colleges (beyond NUNM where we teach this course) receive from us. Again, we think this is imperative for our profession. Some students don't have the time or interest to take the course until after they are licensed. Or, frankly, it wasn't offered to them when in school. **We can't know how many will be in Oregon or out of state that want to take the course. They will also register one at a time, so they won't meet the proposed "at least 10 in Oregon" requirement. It would be detrimental to the marketability of our virtual CE if we couldn't accredit it ahead of time. it would also put a greater burden on the board, as that is potentially a lot of independent applications for the same request.**

In my experience, it is a very helpful selling point to a program to already have CE approved. It helps doctors know how to best use their time/money. I believe it would be very detrimental to our programs if we couldn't continue to apply on behalf of our attendees. It is also detrimental to our goal to increase the education of our community as well as diversify our income as providers.

Please consider allowing Oregon providers to continue to apply for CE on behalf of their attendants, regardless of it is virtual only or in-person only, regardless of it is just for Oregon doctors or includes some out of state, and regardless of if is a small in-person group of less than 10.

We applied and were approved for your PDP (professional development program) CE. This was wonderful for us, as we only have to do it once every 2 years - and our attendees were so grateful to have it already approved. We did that application,

as our current attendees are licensed Oregon doctors (group of 5), but we really want the flexibility to offer to any interested naturopaths, **regardless of location or size of group.** We looked into applying to a bigger CE accrediting group like NANCEAC, but it was incredibly cost prohibitive for a small business like ours.

Thanks for hearing and considering the feedback.

Stefani Hayes ND, LAc

Dr. Stefani Hayes (She/Her)
Kwan Yin Healing Arts Center West
2330 NW Flanders St. Ste 101
Portland OR 97210
email: shayes@kwanyinhealingarts.com
phone: [\(503\) 701-8766](tel:(503)701-8766) ext 335

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From: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Sent: Wednesday, January 24, 2024 4:29 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 five 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 programming 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/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.
- 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)
Executive Director - Oregon Board of Naturopathic Medicine
800 NE Oregon Street, Suite 407
Portland OR 97232
971/673-0193 MESSAGE ONLY

CRUMPLER Robin * OBNM

From: Sally Boyd-Daughtrey <helpmedocsally@vitalitymedicine.org>
Sent: Monday, February 12, 2024 2:50 PM
To: MEDICINE Naturopathic * OBNM
Subject: Please add AANP to the list of "Approved accreditation services, providers, and agencies."

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Dr Sally Boyd Daughtrey, ND

CRUMPLER Robin * OBNM

From: Elizabeth Smith <drelizabethsmithnd@gmail.com>
Sent: Monday, February 12, 2024 11:55 AM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed changes to CEU Approval

You don't often get email from drelizabethsmithnd@gmail.com. [Learn why this is important](#)

Hello,

I'm an Oregon ND and I don't agree with the proposed changes to CEU pre-approval. I understand that OBNM is unable to continue acting as a clearinghouse for programs that don't serve Oregon NDs, but approval should include online opportunities as well as in-person events. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees, while streamlining pre-approval for OBNM, and allows me to learn from naturopathic doctors on the topics that are important for optimal patient care. Especially concerning to me is that Dr. Paul Anderson's webinars will no longer meet the criteria, which is frankly ludicrous.

Thank you,
Dr. Elizabeth Smith
ND (Oregon license 4421), LAc

--

Take care,
Dr. Elizabeth Smith, ND, LAc

CRUMPLER Robin * OBNM

From: Dr. Ana Jackson, ND <info@healthyrootsclinic.com>
Sent: Monday, February 12, 2024 7:28 PM
To: MEDICINE Naturopathic * OBNM
Subject: rule changes

Hi OBNM,

As an Oregon Licensee, the proposed rule changes negatively affect me because currently, I am completing all my CE's on NaturopathicCE.com and my understanding is that they would not be pre-approved credits. Therefore, the rules you are proposing are just going to make me have to submit independent study paperwork for many courses which is extra work on my part and extra work for you as well, since you'll have to independently review each course I complete. There are a lot of ND's upset about these proposed rules. I hope we can find a different way to decrease your workload and also keep other naturopathic CE offerings easily available.

Thank you for your time and understanding,

Dr. Jackson

--

Be well,

Dr. Ana Jackson, ND

Healthy Roots Clinic

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www.healthyrootsclinic.com



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CRUMPLER Robin * OBNM

From: Keivan Jinnah <drjinnah@naturalchoicesclinic.com>
Sent: Monday, February 12, 2024 11:20 AM
To: MEDICINE Naturopathic * OBNM
Subject: Re: HIGH IMPORTANCE: SEVERAL DRAFT RULES SUBMITTED FOR PUBLIC COMMENT INCL CHANGES TO THE CE APPROVAL PROCESS - PUBLIC COMMENT PERIOD ENDS 2/12 @1PM

Hi Robin,
I hope you are well!
I imagine you are probably having a very busy day with the board meeting and public comment.

I emailed with Mary-Beth a few weeks ago about some questions and concerns I had about the proposed CE rule change. I'm not sure if that email was officially part of the public comment so I just wanted to make sure.

My concerns were regarding how the rule change would affect the ability of small doctor groups to apply and receive CE credits. The doctors' group I am part of has been meeting for over 25 years (I was a founding member) and contains 10 Oregon licensed NDs with tremendous clinical experience between them. Each month (excluding July and Dec), one ND member presents on a relevant clinical topic. It is honestly some of the best and most useful CE I have received.

Mary-Beth reassured me the rule change was not designed to affect the ability of ND groups like mine to receive CE. (There is usually one- three docs absent each month leaving the typical monthly attendance about 7-8 NDs). The meetings are all held virtually.

I just wanted to make sure this was in there for the record.

Thank you! Have a great day!
Keivan

On Fri, Jan 12, 2024 at 4:51 PM MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

[The Board submitted several draft rules for public comment.](#)

The public comment period ends Feb. 12 @ 1pm. Please read all drafts in their entirety and email your comments to naturopathic.medicine@obnm.oregon.gov. The Board will discuss all comments received on all of the draft rules at the public board meeting at / about 1pm on Feb. 12. Meeting details will be posted on the Board website approximately one week prior to the meeting.

SUBSTANTIVE CHANGES – Continuing Education Approval Process; OAR 850-040-0215, 0220 and 0230.

Changes to the OAR are necessary because of all, but not limited to, the following:

OBNM is not line with other regulatory agency approval processes; offering free and out of state approval

Oregon is one of the only regulatory agencies in the country that approve CE programs. Additionally, the Board approves CE programs at no cost. Consequently, a significant number of out of state and for profit CE program providers use our approval process to avoid the costs and more rigorous requirements of going through the many CE accreditation services.

Oregon licensee attendance requirement did not effectively reduce the number program approval applications

To ensure licensure fees and Board expenditures benefitted Oregon licensees, the Board implemented a rule two years ago requiring program providers submit proof of registration and attendance of licensed Oregon NDs for approval. Unfortunately, this did not result in the desired outcome of reducing the number of out of state and for profit program providers using our free approval process. Conversely, it created more confusion for providers and effectively increased the time and Board resources spent reviewing, and re-reviewing applications for program approval.

Inefficient use of resources; no significant benefit to Oregon licensees

CE approval is an arduous and an expensive task for Board members and staff. The Board receives approximately 50 applications a month from CE program providers (up to 70 just prior to / during the renewal period). Out of state and profit driven program providers submit the majority of these applications. The vast majority of the applications list only 1-5 Oregon licensees. Additionally, many applications do not contain sufficient proof of registration and attendance as required by the rule. Continuing to be inundated with CE program applications, with the majority not serving a significant number of Oregon licensees, is simply irresponsible. Changing the current process is imperative for increased cost efficiency, economical use of staff and Board resources, and improved quality of a process and education.

Lack of specific program criteria and requirements leading to substandard CE program approval

Current rules lack criteria and sufficient requirements for program approval. Accreditation agencies implement a rigorous, multistep, peer reviewed process, ensuring quality education for naturopathic physicians. The Board's approval process is substandard to accreditation agencies using industry-accepted criterion-based evaluation system. The five licensed members of the Board and Board staff do not have the resources or expertise to match their process or replicate their approval standards.

To address these issues, and numerous other challenges the Board faces with the current process, the following are some of the more substantial changes in the draft rules and the expected outcome:

- Increase in the number of approved accreditation services, providers, and agencies from four (4) to nine (9). Expected Outcome:
 - Reduce number of applications licensees must submit to the Board for approval
 - Provide licensees more options for approved programs

- Increase quality of education
- Allows Oregon licensees that host a live, in-person, structured continuing education program, **in the State of Oregon, attended** by a minimum of ten (10) Oregon licensees, to apply for approval on behalf of the licensed attendees. Expected Outcome:
 - Reduces the burden on licensees by eliminating licensee requirement to submit an application for approval
 - Provide opportunities for Oregon licensees to learn from their colleagues about Oregon specific areas of practice
 - Allow Oregon licensee hosts to create education that is directly related to CE requirements set in rule
 - More efficient use of Board resources by reducing the number of approval applications from licensees for Board review.
- Limits entities eligible to apply for program approval to National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP)
 - Reduce the number of CE program applications for Board review that do not benefit the Oregon licensees
 - Ensure Board resources are spent on approving program applications that serve a significant number of Oregon licensees
 - Close the loophole which allows out of state and for profit program providers from using the free Board approval process to the detriment of licensees, Board members and staff
 - Long term improved education for all naturopathic physicians in the North America, due to out of state / profit driven providers using accreditation agencies for approval.
- Sets program criteria per required CE subject areas; pharmacology; professional ethics, boundaries, and communication; suicide prevention, cultural competency, and pain management. Requires licensee to submit applications for course approval no later than 30 calendar days after the completion of the activity. Expected Outcome:
 - Increase transparency of what is required for licensee application approval
 - Reduce the number of licensee re-submissions for Board review
 - Reduce the uptick in number of approval applications sent to the Board during the renewal period.
 - Increase quality of education due to set criteria for approval
- Sets program criteria and limitations on hours permitted for licensee self-directed activities. Requires licensee to submit applications for approval of self-directed activity no later than 30 calendar days after the completion of the activity. Expected Outcome:
 - Increased transparency of what is required for licensee application approval
 - Reduce the number of licensee submissions for Board review
 - Reduce the uptick in volume of applications received in the renewal period.
 - Increase breadth and quality of education required.

CLARIFICATION – CE Required for Injection IV Therapy, Provider Requirements, 850-040-0240; Moves One-time CE requirements to Division 40

Changes to 850-040-0240 CE Required for Injection IV Therapy, Provider Requirements, are primarily “housekeeping.” IMPORTANT NOTE- no action is required from licensees who previously submitted their CE education report per the rule. This rule clarifies requirements moving forward.

Minor / substantive changes:

- Removes education requirements in Subsection 1(a) Subcutaneous, Intramuscular, Intravenous Injection: Prior to administering or supervising the administration of injections in this section, Licensee must submit to the Board proof of completion of six (6) hours of Board approved education focused on anatomy, palpation, injection technique, aseptic / sterile technique as follows:
 - A. Three (3) hours didactic education
 - B. Three (3) hours practical education
- Removes requirement to complete lower body and lower body extremity training, prior to engaging in training for upper body and upper body extremity training.
- Requires passage of Parenteral Medicine NPLEX elective exam prior to administering IV therapy
- Moves the rule from Division 60 – Prescribing Authority to Division 40 – Continuing Education

DIVISION CHANGE – Moves One-time Continuing Education Required Prior to Administering or Supervising the Administration of IV and Injectable Ketamine, to Division 40, 850-040-0250

OAR 850-040-0250 – Moves Injectable Ketamine CE requirements from Division 60 – Prescribing Authority to Division 40 – Continuing Education. No substantive changes in the rule, edits for clarification only. IMPORTANT NOTE- no action is required from licensees who previously submitted their CE education report per the rule. This rule clarifies requirements moving forward.

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)

Executive Director - Oregon Board of Naturopathic Medicine

800 NE Oregon Street, Suite 407

Portland OR 97232

971/673-0193 MESSAGE ONLY

Petition #1

205 signatories

This primary petition urges the board to consider three specific changes:

- 1) OBNM Should Honor CE Approvals by Other Naturopathic Boards and AANP as Approved Continuing Education for Oregon Licensees (AKA Reciprocity)
- 2) OBNM Should Waive Application Conditions for Specialized CE Hour Applications
- 3) OBNM Should Amend its Course Renewal Process

Please see Timothy Miller's public comment for more information about these changes.

Full Name	Oregon License Number
1 Abrienne Goss	1741
2 Ada Elena Gonzalez	947
3 Adrienne Borg	691
4 Aimee Bonneval	2050
5 Aimee Frieze	4144
6 Aisling Crowe	1760
7 Ajana Miki	1086
8 Alexandra Gotea	4104
9 Amanda Hoffman	1685
10 Amy Kelchner	1286R
11 Ana Squellati	1041
12 Anaheed Jackson	4281
13 Angela Potter	2053
14 Anya de la Motte	4314
15 Ashlee Jane	4165
16 Ashlie Hempstead	1918
17 Ashly Benson	4121
18 Barry Wheeler	1753
19 Bonnie Nedrow	1479
20 Bonnie Skakel	1849
21 Bonnie Wickwire	862
22 Bridghid McMonagle	1429
23 Calley Asbill	3065
24 Cara Orscheln	1857
25 Carol Collie McIntyre	1726
26 Carrie Decker	2001
27 Carrie Norris	1645
28 Casey Walsh	4446
29 Celisha Gerber	2088
30 Charlyne Coke	4378
31 Chiaoli Lu	1368
32 Chris Booren	1050

33	Chris Chlebowski	1886
34	Chris Neary	4001
35	Christa Barton	3089
36	Christie Winkelman	1639
37	Cori Burke	2096
38	Courtney Day	2098
39	Crystal Hannan	1398
40	Cynthia Buxton	4316
41	Dana Herms	1532
42	Daniel Smith	1322
43	Danielle Lockwood	3066
44	Darcy Ries	1923
45	Deborah McKay	1444
46	Deborah Nixdorf	1514
47	Denise Renee Wilson	800
48	Dennis Perry	1927
49	Durr Elmore	607
50	edythe Vickers	688
51	Eileen Hutchinson	1725
52	Elizabeth Burch	664
53	Elizabeth Smith	4421
54	Elizabeth Sutherland	922
55	Ellen Sauter	1805
56	Emelia Madeleine Portuondo	3070
57	Emerald Mansfield	2047
58	Emily Burke	2044
59	Emily Livengood	4087
60	Emily Ryan	4158
61	Emma Baker	1216
62	eric mallory	3079
63	Ericha Clare	1610
64	Erin Willis	2085
65	Gabrielle Carter	3015
66	Galina Danily	3090
67	Gregory McDonald	660
68	Hayleigh Ast	4456
69	Hayley Jensen	4431
70	Heath McAllister	4188
71	Heidi Peterson	991
72	Hilary Farberow-Stuart	684
73	Hilary Sandell	2082
74	Holly Castle	921
75	Holly Oliver	1713
76	Isabel Sweitzer	4125

77 Jami Heyting	4026
78 Jamie Kunkle	4322
79 Jane Birchard	1175
80 Janelle Siler	1909
81 Jared Zeff	463
82 Jason Wysocki	3076
83 Jenna Halbert	4360
84 Jennifer Mlnarik	1587
85 Jennifer Sugden	1352
86 Jennifer Brennan-Kos	1034
87 Jennifer Carroll	1660
88 Jennifer Davidson	4147
89 Jennifer Greer	3017
90 Jennifer Reid	920
91 Jessica Hebert	4396
92 Jieyi Zhang	1171
93 Jocelyn Cooper	1894
94 Julie Brush	1458
95 Julie Glass	960
96 Julie Greenberg	4355
97 Kalen Garr	8054
98 Kara Crisp	3061
99 Karen DeWitt	1873
100 Karen Cureton	4000
101 Karmen Geller	3046
102 Katherine Neubauer	2018
103 Kathleen Flewelling	931
104 Kathryn Bodden	4215
105 Kathryn Brooks	1998
106 Kathryn Clements	4331
107 Kathryn Kloos, ND	1798
108 Kelsey Stang	4167
109 Kendall Welch	5030
110 Kenya Arnold	4090
111 Kerie Raymond	1505
112 Kevin Wilson	546
113 Kim Landi	823
114 Kristie Ritchey	1811
115 Kryzia Nicole Santos Olsen	4101
116 Kurt Beil	1520
117 Laura Tiberio	1740
118 Leigh Ann Harvison	4032
119 Linda Elyssia Herrick	603
120 Lisa Hendrick	4412

121	Lisa Matejka	4141
122	Lori Forest	1186
123	Lori Soule	983
124	Lori von der Heydt	828
125	Lorraine Ferron	4096
126	Louise Tolzmann	896
127	Madeline Schaefer	583
128	Maeshowe Pierce	1771
129	Mai Nguyen	1553
130	MARCUS COPLIN	4155
131	Margaret Philhower	1501
132	Marina Bazyuk	1722
133	Mark Bricca	1652
134	Marney Johnson	4334
135	Marnie Loomis	1100
136	Mary Frazel	1473
137	Mary Fu	4182
138	Mary Scott	729
139	McClane Duncan	2046
140	McKenzie Myers	4386
141	Melissa Bosserman	4214
142	Meredith Peyton	4323
143	Michael Hummel	4465
144	Michael McKee	4259
145	Michelle Brown-Echerd	2077
146	Mikinzie Smoot, ND	3095
147	Miranda Costa	3058
148	Miriam Mazure-Mitchell	1097
149	Natasha Kassam	1563
150	Nathalie Paravicini	1890
151	Nicholas Becker	4307
152	Nicole Gansemer	4277
153	Nicole Silva	4210
154	Noel Thomas	1439
155	Pamela Plank	1643
156	Patricia Meyer	870
157	Paula Steinkamp	810
158	Phyllis Rapport	822
159	Prafulla Morris	807
160	Rachael DelToro	4070
161	Rachael Karlin	4203
162	rachel meredith	1226
163	Rachel Sterry	1752
164	Rachel Hess	1172

165 Rachel Stricker	2084
166 Rachel Yeager	4423
167 Rebecca Clemson	4130
168 Rebecca Provorse	1375
169 Rob Dramov	1127
170 Robert Neilson	3023
171 Robert Schwartz	674
172 Robin Tauzin	1627
173 Rosalind Donovan	4169
174 Rosetta Koach	978
175 Ruth Carden	4359
176 Sandra Szabat	989
177 Sandy Musclow	9305
178 Sara DeFrancesco	2036
179 Sara Gillham	1836
180 Sara Rodgers	3073
181 Sara Wood	1551
182 Sarah Martin	4348
183 Sarah Schumann-Curtis	1737
184 Shannon Brown	1113
185 Shawnte Yates	2173
186 Sheila Myers	751
187 Shelby Crespo	4385
188 Stephen Smitherman	4305
189 Subhkarman Multani	4468
190 Sulie Branstetter	4154
191 Susan DeLaney	594
192 Suzanne Scopes	642
193 Sydmarie Bisenius	2029
194 Theolinda Barry	1185
195 Timothy Miller	3007
196 Tina Dreisbach	4166
197 Tracy Edinger	1454
198 Tyna Moore	1637
199 Usha Honeyman	1630
200 Veaney McIrvin	1029
201 Virginia Oram	1004
202 Virginia Osborne	886
203 Wendy Gebhart	1534
204 Wendy Leigh H White	3074
205 Wendy Vannoy	1374

Petition #2

119 signatories

This supporting petition urges the board to consider one specific change:

1) OBNM Should Include NaturopathicCE.com as Being Eligible to Submit CE Applications through OBNM

Please see Timothy Miller's public comment for more information about this change.

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1 Abrienne Goss	1741
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15 Carol Collie McIntyre	1726
16 Catherine Gurski	1397
17 Celisha Gerber	2088
18 Charlyne Coke	4378
19 Chiaoli Lu	1368
20 Chris Booren	1050
21 Christa Barton	3089
22 Crystal Hannan	1398
23 Cynthia Buxton	4316
24 Daniel Smith	1322
25 Darcy Ries	1923
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28 Denise Renee Wilson	800
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30 Elizabeth Burch	664
31 Ellen Sauter	1805
32 Emerald Mansfield	2047
33 Emily Burke	2044
34 Emily Ryan	4158

35 Emma Baker	1216
36 Ericha Clare	1610
37 Erin Willis	2085
38 Gabrielle Carter	3015
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54 Jessica Hebert	4396
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56 Julie Glass	960
57 Julie Greenberg	4355
58 Kalli Keddle	4072
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75 Marina Bazyuk	1722
76 Marney Johnson	4334
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78 Mary Fu	4182

79	Melissa Bosserman	4214
80	Meredith Peyton	4323
81	Micaela Coria -carew	1273
82	Michael Hummel	4465
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92	Phyllis Rapport	822
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95	Rachel Sterry	1752
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98	Rob Dramov	1127
99	Robin Tauzin	1627
100	Rosetta Koach	978
101	Ruth Carden	4359
102	Sandra Szabat	989
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107	Sarah Schumann-Curtis, ND	1737
108	Shannon Brown	1113
109	Shawnte Yates	2173
110	Sheila Myers	751
111	Shelby Crespo	4385
112	Sulie Branstetter	4154
113	Suzanne Scopes	642
114	Timothy Miller	3007
115	Tina Dreisbach	4166
116	Usha Honeyman	1630
117	Veaney McIrvin	1029
118	Wendy Gebhart	1534
119	Wendy Vannoy	1374