CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Wednesday, December 20, 2023 9:40 AM
To: MEDICINE Naturopathic * OBNM
Subject: Reconsideration of CE approval process

On Dec 17, 2023, at 4:04 PM, Gibran Ramos <gibran.ramos@gmail.com> wrote:

You don't often get email from gibran.ramos@gmail.com. Learn why this is important

Dear Mary Beth,
I know this is the busiest time of year for you and the OBNM, but I wanted to write to you now since I know you are rewriting the CE approval rules. This suggestion may significantly decrease the staff time in regards to the CE approval process.

My wife is a professional engineer and licensed in the state of Oregon (Oregon State Board of Examiners for Engineering and Land Surveying).
For their licensing requirements, they submit their CE application testifying that they have met all the required hours for renewal according to their CE criteria, list the name of the CE and the hours and that's it. The Engineering board does not check each individual CE to see whether it meets their criteria nor do they pre-approve the CE.

The CEs class/seminar contents/class description/schedule are only checked if there is a random audit. If there is an audit the engineer licensee must provide a certificate/class/seminar description. There are no pre-approved presenters/presentations. They are also not allowed to take business classes nor count branded/commercial/manufacturer product demonstrations.

Hopefully the process that the engineering board uses can be used for the OBNM.

Sincerely,
Gibran Ramos, ND, LAc
ND License number 1821

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Gibran Ramos, ND, LAc
Holistic Physician for Hormone, Immune and Metabolic Health

Pohala Clinic
7477 SE 52nd Ave
Portland, OR 97206
(map here)

Scheduling: (503) 572-4196
On-line scheduling can be done here.
Pohala Fax: 833-989-2525
Dr. Ramos' direct fax: 503-715-5789

Website: https://www.pohalaclinic.com/

Confidential Communication:
This message and any attachments are intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and destroy the original and any copies of this message.

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Wednesday, January 31, 2024 9:44 AM
To: MEDICINE Naturopathic * OBNM
Subject: New CE rules

https://www.naturopathicce.com/instructor/karen-cureton/

From: MEDICINE Naturopathic * OBNM
Sent: Friday, January 12, 2024 6:57 PM
To: 'Karen Cureton' <drkarencureton@gmail.com>; MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: RE: New CE rules

Thank you for your message. The Board will review your comments prior to implementing the final rules.

The email sent and now posted on the website was written with the intent of explaining the need for the rules, and the impact of those changes on licensees.

Please see the website to re-review the email, in particular the section "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" as well as text of all of the draft rules.

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

As I also explained in the email, CE program providers have ample options other than OBNM to apply for program approval. NaturopathicCE.com have the option to apply for approval through an accreditation agency listed in the Oregon Administrative Rules for Board approval. Additionally, as a licensee if you attend a course through NaturopathicCE.com that has not been approved by an accreditation agency, as a licensee you may apply for approval for the program you attended.

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

From: Karen Cureton <drkarencureton@gmail.com>
Sent: Friday, January 12, 2024 5:25 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: New CE rules

Hi there,

I just read the email with the new proposed CE requirements. It's pretty hard to understand and I am requesting the board send out an easy to understand version with more of the practical implications for licensees. What are the downsides to these changes for licensees? What are the upsides?

One concern I have is that one of the best CE providers for Naturopathic physicians is NaturopathicCE.com and it was not listed as a pre-approved CE provider or that they would even be able to apply for Oregon Licencees. A huge number of Oregon NDs take CEs here and I feel very strongly that it needs to be added to the list of CE providers who can get pre-approval for Oregon licensees. If you don't pre-approved Naturopathicce.com you will get an infinite number more CE applications from licensees for these courses, effectively wiping your benefit of having to approve fewer applications.

Additionally it was hard to tell if there would be any changes made to the CE approval process for licensees taking non-pre-approved courses. This process is antiquated, cumbersome, and honestly a waste of time in my opinion for everyone. It should absolutely be electronic if it continues in any form.

Thank you,
Dr. Karen Cureton

From:	Jo Jenner
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
Date:	Friday, January 12, 2024 5:29:01 PM

Thank you MaryBeth,
From my perspective and how you lay this out...it looks like a good idea. I had no idea there was so many applications seeking CME approval.
Thank you for all you do to keep the profession top notch.
Jo Jenner ND

On Fri, Jan 12, 2024 at 2:51 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

From:	MEDICINE Naturopathic * OBNM
To:	Khivan Oberoi, ND; 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
Date:	Friday, January 12, 2024 6:36:53 PM

Thank you for your reply. The Board will review these comments prior to adopting the rules.

To answer your questions, please visit our website and review the proposed rules in their entirety.

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

If you still have questions, or have additional comments after reading the rules, please let us know.

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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

From: Khivan Oberoi, ND <khivan.oberoi@gmail.com>
Sent: Friday, January 12, 2024 5:07 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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

Comments on CE Approval Process

- Increase in the number of approved accreditation services, providers, and agencies from four (4) to nine (9). Expected Outcome: *Examples of approved accreditation services/providers/agencies?*
- 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: *Will these be applied for in advance of or after completion of the CE program? IE- with 10 people registered, can a Licensee apply for CEUs or would one have to wait until after the program and identify the 10 people?*

- Limits entities eligible to apply for program approval to National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP) *Why not also include AANP?Or would this be covered in the "accreditation services/providers/agencies" above?*
- Sets program criteria per required CE subject areas *Agree this is needed. Who determines the criteria/limitations?*
- 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. *Agree this is needed. Who determines the criteria/limitations?*

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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

--
Khivan Oberoi, ND

From:	MEDICINE Naturopathic * OBNM
To:	Dr. Reynolds; 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
Date:	Saturday, January 13, 2024 12:01:20 PM

Thank you for your message. The Board will review your comments at the February meeting. I anticipate the Board will make additional changes to the rules based on all the public comments. So please continue to monitor the website page.

Of note, if you look at the email I sent, the "expected outcomes" for almost every one of these changes is the process will be far less onerous on the licensee. The expectation is that these rules will reduce the number of applications licensees will need to submit for approval. We expanded the number of pre-approved providers to choose from and continue to provide approval for in state / licensee driven programing.

As for Paul Anderson and other for profit out of state CE providers, they have ample options to get their CE approved through accreditation agencies listed in the proposed rule. When they complete that process and are approved, all licensees will need to do is take their course and upload their certificate.

As explained exhaustively in the email, the Board does not have the resources or expertise to effectively handle the volume of the applications from out of state / for profit providers when there are many options for approval from organizations that exist specifically for this purpose.

Thank you for taking the time to comment. Your input is extremely valuable to the Board as we make these difficult decisions and choices.

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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

From: Dr. Reynolds <drreynolds@oregonnaturalmedicine.com>
Sent: Saturday, January 13, 2024 6:35 AM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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 Mary et al

Thanks for looking at this. The issue sounds complex and I am sure the board is feeling overwhelmed with things. This sounds though as if it is all about making the boards job easier and not licensees. I am all about making the boards life easier and I totally understand that our board works tirelessly and I think some of this makes senses but I am not sure I understand how this will affect the licensee/applicant. My intuition is that is will make our lives harder and finding CEs more difficult and expensive.

It may not be popular with the board but shouldn't the focus be on making applicants/licensees live's easier. Isn't this one of the roles of the OBNM? Right now I have licenses in Washington and Oregon and Oregon is a much more archaic and tedious process. It dumbfounds me every year when I apply how long it will take me to complete my application and then how quickly it is actually approved (the latter is great).

I am all for making the boards life and job easier. I think more staffing and stringent qualifications make sense but I also use out-of-state for profit CEs and don't want to see them go away and my options to be limited. For instance I use Paul Anderson CEs which are AANP approved. They are fantastic as most of you can attest to....but they are never preloaded in the system and they are often 1-2 hrs.So I have to type in line by line all of the info.

So one question is...How will this affect me using those and for poor Paul to get them approved since he by definition is an "out—of-state, for profit organization "? My concern is we are focused on limiting organizations that the board thinks may be providing sub optimal education but it could have a chilling affect for those that don't. I also think it is not trusting of our applicants....who are doctorate level professionals.

Already, the process is so antiquated. I never understand why this process is so tedious and time consuming.My Washington license is every 2 years and takes no time to complete. Oregon.....well it is massively time consuming, has to be done yearly and as I can't hand this off to someone it is my time that is consumed.

This leads me to a another question. Why are AANP credits not automatically approved? I mean is there a question that someone who attends the AANP is getting subpar continuing education? What about Paul Anderson? What about courses that are taught at other institutions and recorded such as at Bastyr? It seems like we are putting all our

trust in OANP and NUNM to educate us. This is both exclusive (which is never good) and short sighted. Why are these institutions the ones we can just check off and others are subject to a strenuous background checks? Why not have other institutions (for a cost) apply to become an accredited supplier of CEs (such as Anderson, Bastyr, Sonora etc). As for AANP.....let's get real...just apply them. I attended AANP this year and it was no different than OANP credits. Let's support both our state and national organizations....if we can't trust AANP we are in a sad state. Maybe we do but why do I have to type everything in by hand....are we really that distrustful of applicants?

As for time to apply....oh brother! Rt now it takes me 1.5 hours or more to apply for my license bc I have to enter every Ce (often 1 or 1.5 credits) at a time. Maybe I am doing this wrong but I think they need to be hand entered(if I'm wrong please tell me to simply my life). Why not just ask applicants if they have completed the necessary credits or have them upload their CE certificates (even this is ridiculous and time consuming though). The system should be made easier ...absolutely for our hard working board but also for the applicants. There is no way that our MD and DO counterparts have to line by line enter every CE. My mother is a nurse practitioner and I know she doesn't have to do this and can apply every two years (around 38 ce hours every 2 years!) Why not just ask docs if they have completed their CEs, make them sign that they need the required hours of each category (10 pharmacy, 2 ethics etc)....then audit 10%. If a person doenst have them...then there are consequences.

I like many of my counterparts actually love doing CEs , meeting up for AANP and learning new things. I am always amazed at doctors like Dr.Anderson and others who are using innovative things in the field. It makes our profession stronger. But making things harder for some CE providers to get approved and making less options for licensees is probably not a great idea. More relevant I think is to make the process easier for we the applicants....stream line it and for gods sake look at an every 2 year license like our Washington and Oregon MD counterparts have.

Thank you for your time and dedication

John Reynolds, ND

> On Jan 12, 2024, at 7:50 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:

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

2. 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:
    1. Reduces the burden on licensees by eliminating licensee requirement to submit an application for approval
    2. Provide opportunities for Oregon licensees to learn from their colleagues about Oregon specific areas of practice
    3. Allow Oregon licensee hosts to create education that is directly related to CE requirements set in rule
    4. More efficient use of Board resources by reducing the number of approval applications from licensees for Board review.

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    1. Reduce the number of CE program applications for Board review that do not benefit the Oregon licensees
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    4. 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.

4. 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:

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5. 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:
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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:

1. 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:
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2. Removes requirement to complete lower body and lower body extremity training, prior to engaging in training for upper body and upper body extremity training.
3. Requires passage of Parenteral Medicine NPLEX elective exam prior to administering IV therapy
4. 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.

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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

From:	MEDICINE Naturopathic * OBNM
To:	Sacred Medicine; 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
Date:	Sunday, January 14, 2024 10:38:30 AM

Thank you for your message. The Board will review your comments at the Feb board meeting and take them into consideration before adopting the final rules.

Please rest assured, we did NOT reduce the educational requirements for IV / Injection therapy. The elimination of the 6 hours was because that is already required in medical school and making licensees report was unnecessary paperwork for the licensee and staff.

No changes were made to the education required for either upper or lower body injections. In the previous rule, it was mandatory for licensees to complete lower body training, before taking upper body training. This had an unintended effect of forcing licensees that only wanted to do upper body injections to do unnecessary lower body education.

No changes were made to Ketamine education. The rule was just moved to the more appropriate CE division of the OARs.

Again, thank you for taking the time to submit your comment. Your input is extremely valuable to the Board as we make these difficult choices and decisions.

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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

From: Sacred Medicine <drkellyf58@gmail.com>
Sent: Saturday, January 13, 2024 12:54 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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

Mary-Beth,

Thanks for this opportunity.

I think the amendment of the CE issue is good for the fiscal integrity of Oregon Board of

ND.

I am not certain about any changes or alterations of the IV, IM, Ketamine injectables and the Lower/Upper body access provisions. Is the change just moving to an umbrella Division 40?
I think what ever happens in this area of educational and clinical usage, satisfaction of requirements can not be reduced. These procedures, which entail an invasive and possibly harmful situation without adequate didactic and clinical support, should be closely held to accountability and ethical standards. As with any "delicate" exam, the ketamine therapeutics provide an opportunity for clinicians to be present with a client, without a noted "chaperone" or "witness" while a client is under anesthetic states and processing complex presentations. If anything, these procedures and clinical formats and educational requirements, for the safety of the clinician and client, should be monitored and held to a high standard of educational and clinical application. There is ample opportunity for liability for the undereducated and underseasoned practitioner who moves forward in opening their practice to this format of medicine.
Thanks again for taking input on these issues and amendments.
Dr Kelly Fitzpatrick, ND, BSN, MPS, DHANP
Former NCUM IV instructor and clinical supervisor 1999 - 2005

Virus-free.www.avast.com

On Fri, Jan 12, 2024 at 4:56 PM MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

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>
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Naturopathic.Medicine@obnm.oregon.gov

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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

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*** Please be advised: Due to a full work schedule, I may not be able to respond as quickly as you or I would like. Please call the office if you require a more timely response. Thanks so much for your understanding.**

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Voicemail is secure. Email is not considered a secure mechanism for communication between patient and physician. Also, in an emergency, you can dial 911, go to urgent care or ER.

Dr Kelly M. Fitzpatrick, BSN, MPS, ND, DHANP

132 E Broadway Suite 410

Eugene, OR 97401

From: MEDICINE Naturopathic * OBNM
To: Teresa Gryder; MEDICINE Naturopathic * OBNM
Subject: RE: COMMENTS on proposed rule changes on CE approval process
Date: Sunday, January 14, 2024 11:12:17 AM

Thank you for your message. The administrative costs of implementing fees for application review are not cost effective and would not solve the fundamental problem. The Board does not have the resources or expertise to effectively handle the volume of the applications from out of state / for profit providers. There are plenty of options for providers to gain approval from accreditation agencies / organizations that exist specifically for this purpose.

The Board will review your comments at the Feb. Board meeting and take them into consideration prior to adopting final rules. It is very likely the Board will make changes to the proposed drafts based on public comment and file amended drafts in March. Please continue to check our website for updates.

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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

From: Teresa Gryder <t4eresa@gmail.com>
Sent: Sunday, January 14, 2024 9:19 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: COMMENTS on proposed rule changes on CE approval process

SYMPATHY: First let me just say I wondered! Sorry you've been inundated by out-of-state applicants because of the currently lax rules, and glad you're taking charge. Limiting applications is a reasonable approach.
QUESTION: Is a fee proposed for CE approval?
COMMENT: How many attendees have been required for approval up to now? New number of 10 is high---too many for my livingroom. (Approving presenter instead of requiring licensees to seek approval individually makes good sense)
SUGGESTION: What about limiting applicants to Oregon-based only?
NO: No criteria for approval? This seems crazy. Willing to help with a peer-approval process but not as a volunteer.
YES: Approving 9 instead of 4 approved accreditation services/providers/agencies makes sense. Or more. If you trust someone to put on a good quality program just let them do it.
NO: Limiting entities eligible to apply for program approval to NUNM and OANP seems overly

strict. We can't let these two orgs have a monopoly on CE programs. (I have been using Community Compounding's Pharm CE annually for several years now and it is good, and Oregon based. They are for-profit, but I do not want to see this option removed.)
YES: Licensees must apply for approval of self-directed activity within 30 days of completion. At the very least this will limit the end-of-year glut. I'm very interested in the criteria. I have not used this option but am a life long learner and spend more time studying than I do in CE classes.

--

Teresa Gryder
Portland, Oregon
C: (5o3) 479-542six

Living a conscious life is extreme sport enough.
--Liz Sutherland, 2008

From:	MEDICINE Naturopathic * OBNM
To:	Shena Vander Ploeg; 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
Date:	Sunday, January 14, 2024 10:45:24 AM

Per this draft, if you have already completed the training IV required in the prior rule, you would only be required to take the Ozone training. However, this is just a draft rule, so please continue to monitor the website for any changes in the draft.

The Board will review your comments; thank you for providing your input.

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Executive Director - Oregon Board of Naturopathic Medicine
800 NE Oregon Street, Suite 407
Portland OR 97232
971/673-0193 MESSAGE ONLY

From: Shena Vander Ploeg <shena.vanderploeg@gmail.com>
Sent: Saturday, January 13, 2024 9:06 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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

Hey there-

I had a question I didn't see clarified, regarding new rules proposed:

If we always have completed advanced IV training, but have not completed ozone... would we be able to add this after the rule by taking ozone specific CE or would we have to take the NPLEX parenteral exam?

Yours in health,

Dr Shena Vander Ploeg

On Jan 12, 2024, at 4:52 PM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

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Portland OR 97232
971/673-0193 MESSAGE ONLY

From: MEDICINE Naturopathic * OBNM
To: Dr. Gordon Cogan; MEDICINE Naturopathic * OBNM
Subject: RE: Clarity on IV therapy certification and registration with OBNM
Date: Sunday, January 14, 2024 10:38:31 AM

Thank you for your message. The Board regulates the practice of naturopathic medicine, not facilities or business practices.

Please see the following Oregon Administrative Rule for all of the answers to your question regarding training / education and reporting requirements to administer IV, and delegation authority and limitations

https://secure.sos.state.or.us/oard/viewSingleRule.action;JSESSIONID_OARD=ZGYE8daXy2Tz7qJ3GOGxAZborq2FAms4XuNUYDqH0I1bZF8VA5O4!943400972?ruleVrsnRsn=289269

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

From: Dr. Gordon Cogan <drcogan@naturopathicperformance.com>
Sent: Saturday, January 13, 2024 11:39 AM
To: MEDICINE Naturopathic * OBNM <Naturopathic.Medicine@obnm.oregon.gov>
Subject: Clarity on IV therapy certification and registration with OBNM

> You don't often get email from drcogan@naturopathicperformance.com. Learn why this is important

Hello, I am writing in hopes of finding clarity on the certification and registration (both as an individual practitioner AND as a business) with OBNM to practice and provide IV nutrient therapy in Oregon.

I have recently pursued both a certification course (CNPBC qualifications) as well as an advanced course in IV infusion therapy.

1. I am planning to offer this in clinic in the coming months and I would like to know if there are reporting and registration requirements necessary prior to being fully authorized to do so?

2. Regarding delegation of duties with appropriate training, do those duties include phlebotomy, Intramuscular, subcutaneous, intradermal injections, and intravenous injections, placement of catheters?

3. Are we able to delegate those duties to Nurses or Nurse practitioners in Oregon?

4. Can you advise on where to find information on the clinic safety and equipment requirements or if there is a document that summarizes those requirements?

Thank you kindly for your time and guidance toward clarifying these questions. Have a safe weekend.

Regards,
Dr. Gordon Cogan

From:	MEDICINE Naturopathic * OBNM
To:	Dr. Reynolds; 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
Date:	Sunday, January 14, 2024 10:42:42 AM

Because they are an association, no associations are preapproved providers. Although a lot of our work overlaps – Associations mission is to promote the profession; while the Board's is to protect the public. Therefore they approve courses that are not allowed by rule.

Please monitor the progress / upcoming drafts for changes.

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

From: Dr. Reynolds <drreynolds@oregonnaturalmedicine.com>
Sent: Saturday, January 13, 2024 2:57 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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

Thank you for your response. One last question is about AANP approved CEs. Why are they not automatically approved and included in the drop down menu?

> On Jan 13, 2024, at 3:01 PM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:
>
> Thank you for your message. The Board will review your comments at the February meeting. I anticipate the Board will make additional changes to the rules based on all the public comments. So please continue to monitor the website page.
>
> Of note, if you look at the email I sent, the "expected outcomes" for almost every

one of these changes is the process will be far less onerous on the licensee. The expectation is that these rules will reduce the number of applications licensees will need to submit for approval. We expanded the number of pre-approved providers to choose from and continue to provide approval for in state / licensee driven programing.

As for Paul Anderson and other for profit out of state CE providers, they have ample options to get their CE approved through accreditation agencies listed in the proposed rule. When they complete that process and are approved, all licensees will need to do is take their course and upload their certificate.

As explained exhaustively in the email, the Board does not have the resources or expertise to effectively handle the volume of the applications from out of state / for profit providers when there are many options for approval from organizations that exist specifically for this purpose.

Thank you for taking the time to comment. Your input is extremely valuable to the Board as we make these difficult decisions and choices.

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

From: Dr. Reynolds <drreynolds@oregonnaturalmedicine.com>
Sent: Saturday, January 13, 2024 6:35 AM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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 Mary et al

Thanks for looking at this. The issue sounds complex and I am sure the board is feeling overwhelmed with things. This sounds though as if it is all

about making the boards job easier and not licensees. I am all about making the boards life easier and I totally understand that our board works tirelessly and I think some of this makes senses but I am not sure I understand how this will affect the licensee/applicant. My intuition is that is will make our lives harder and finding CEs more difficult and expensive.

It may not be popular with the board but shouldn't the focus be on making applicants/licensees live's easier. Isn't this one of the roles of the OBNM? Right now I have licenses in Washington and Oregon and Oregon is a much more archaic and tedious process. It dumbfounds me every year when I apply how long it will take me to complete my application and then how quickly it is actually approved (the latter is great).

I am all for making the boards life and job easier. I think more staffing and stringent qualifications make sense but I also use out-of-state for profit CEs and don't want to see them go away and my options to be limited. For instance I use Paul Anderson CEs which are AANP approved. They are fantastic as most of you can attest to....but they are never preloaded in the system and they are often 1-2 hrs.So I have to type in line by line all of the info.

So one question is...How will this affect me using those and for poor Paul to get them approved since he by definition is an "out—of-state, for profit organization "? My concern is we are focused on limiting organizations that the board thinks may be providing sub optimal education but it could have a chilling affect for those that don't. I also think it is not trusting of our applicants....who are doctorate level professionals.

Already, the process is so antiquated. I never understand why this process is so tedious and time consuming.My Washington license is every 2 years and takes no time to complete. Oregon.....well it is massively time consuming, has to be done yearly and as I can't hand this off to someone it is my time that is consumed.

This leads me to a another question. Why are AANP credits not automatically approved? I mean is there a question that someone who attends the AANP is getting subpar continuing education? What about Paul Anderson? What about courses that are taught at other institutions and recorded such as at Bastyr? It seems like we are putting all our trust in OANP and NUNM to

educate us. This is both exclusive (which is never good) and short sighted. Why are these institutions the ones we can just check off and others are subject to a strenuous background checks? Why not have other institutions (for a cost) apply to become an accredited supplier of CEs (such as Anderson, Bastyr, Sonora etc). As for AANP.....let's get real...just apply them. I attended AANP this year and it was no different than OANP credits. Let's support both our state and national organizations....if we can't trust AANP we are in a sad state. Maybe we do but why do I have to type everything in by hand....are we really that distrustful of applicants?

As for time to apply....oh brother! Rt now it takes me 1.5 hours or more to apply for my license bc I have to enter every Ce (often 1 or 1.5 credits) at a time. Maybe I am doing this wrong but I think they need to be hand entered(if I'm wrong please tell me to simply my life). Why not just ask applicants if they have completed the necessary credits or have them upload their CE certificates (even this is ridiculous and time consuming though). The system should be made easier ...absolutely for our hard working board but also for the applicants. There is no way that our MD and DO counterparts have to line by line enter every CE. My mother is a nurse practitioner and I know she doesn't have to do this and can apply every two years (around 38 ce hours every 2 years!) Why not just ask docs if they have completed their CEs, make them sign that they need the required hours of each category (10 pharmacy, 2 ethics etc)....then audit 10%. If a person doenst have them...then there are consequences.

I like many of my counterparts actually love doing CEs , meeting up for AANP and learning new things. I am always amazed at doctors like Dr.Anderson and others who are using innovative things in the field. It makes our profession stronger. But making things harder for some CE providers to get approved and making less options for licensees is probably not a great idea. More relevant I think is to make the process easier for we the applicants....stream line it and for gods sake look at an every 2 year license like our Washington and Oregon MD counterparts have.

Thank you for your time and dedication

John Reynolds, ND

On Jan 12, 2024, at 7:50 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:

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

2. 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:
    1. Reduces the burden on licensees by eliminating licensee requirement to submit an application for approval
    2. Provide opportunities for Oregon licensees to learn from their colleagues about Oregon specific areas of practice
    3. Allow Oregon licensee hosts to create education that is directly related to CE requirements set in rule
    4. More efficient use of Board resources by reducing the number of approval applications from licensees for Board review.

3. Limits entities eligible to apply for program approval to National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP)
    1. Reduce the number of CE program applications for Board review that do not benefit the Oregon licensees
    2. Ensure Board resources are spent on approving program applications that serve a significant number of Oregon

licensees

3. 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
4. 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.

4. 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:
    1. Increase transparency of what is required for licensee application approval
    2. Reduce the number of licensee re-submissions for Board review
    3. Reduce the uptick in number of approval applications sent to the Board during the renewal period.
    4. Increase quality of education due to set criteria for approval

5. 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:
    1. Increased transparency of what is required for licensee application approval
    2. Reduce the number of licensee submissions for Board review
    3. Reduce the uptick in volume of applications received in the renewal period.
    4. 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:

1. 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:
    1. Three (3) hours didactic education
    2. Three (3) hours practical education
2. Removes requirement to complete lower body and lower body extremity training, prior to engaging in training for upper body and upper body extremity training.
3. Requires passage of Parenteral Medicine NPLEX elective exam prior to administering IV therapy
4. 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

From:	MEDICINE Naturopathic * OBNM
To:	Dr. Reynolds; 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
Date:	Monday, January 15, 2024 10:27:56 AM

OANP and NUNM are located in the State of Oregon and we know that they continuously serve a large swath of Oregon licensees and provide excellent programing.

Important – please review the rule in its entirety. These are NOT the only entities the Board will ACCEPT approved education from.
Conversely, the Board expanded the number of accreditation agencies / organizations and regulatory authorities that are approved providers from four to nine. The expected outcome of this change is that licensees will have more approved CE options to choose from – and thus lessen the burden on licensees having to send in their own applications for approval.

Please see https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf

The portion of the rule you cite only restricts the number of **program providers** that may apply for program approval. We have restricted program approval to these Oregon based institutions because we have to reduce the volume of out of state and for profit organizations that are using our free approval process for their benefit – not the benefit of Oregon licensees.

Additionally, Oregon licensees continue to have the option to attend and apply for approval of any CE program that fits the set criteria for approval. The rule did NOT change the licensees ability to apply for education approval.

Please see: https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

Thank you for your comments, the Board will review all public comments at the Feb. Board meeting prior to making any final changes to the rule.

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

From: Dr. Reynolds <drreynolds@oregonnaturalmedicine.com>
Sent: Sunday, January 14, 2024 11:33 AM

To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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

I will, but why preferred treatment of these two association or entities?

- National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP)

> On Jan 12, 2024, at 7:50 PM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:
>
> Limits entities eligible to apply for program approval to National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP)

CRUMPLER Robin * OBNM

From: BAPTISTA Mary Beth * OBNM
Sent: Tuesday, January 16, 2024 9:44 AM
To: Terrance Manning
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Public comment on proposed changes

Thank you Dr. Manning!! I appreciate your support. The Board will review your comments at the Feb. meeting.

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

From: Dr Manning <terrymanningnd@gmail.com>
Sent: Monday, January 15, 2024 8:37 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Public comment on proposed changes

You don't often get email from terrymanningnd@gmail.com. Learn why this is important

I suppose most people who comment have something either upset, detracting, or a substantive concern.

I fully support the CE changes and have no significant concerns.

I fully support the IV and Injection therapy changes and am happy that the lower and upper extremity issue will be fixed.

Best,
Dr. Manning

--
Terrance Manning II, ND, RMSK, MA
Interventional Orthopedic and Orthobiologic Specialist; **RestorePDX**
Clinical Adjunct Faculty-Regenerative Medicine; **National University of Natural Medicine**
Vice President and Founding Board Member; **Naturopathic Orthopedic Medicine Academy**

Instagram @regenerativemskdoc
Facebook facebook.com/terrymanningnd

Restore PDX Phone: 503.535.8302 Referral Fax: 855.276.2456

"But metabolism is more than a method of power generation, or, food is more than fuel: in addition to and more basic than, providing kinetic energy for the running of the machine, its role is to build up originally and replace continually the very parts of the machine. Metabolism thus is the constant becoming of the machine itself--and this becoming itself is a performance of the machine: but for such performance there is no analogue in the world of machines."
~~ Hans Jonas, The Phenomenon of Life

From: MEDICINE Naturopathic * OBNM
To: Heather Krebsbach; MEDICINE Naturopathic * OBNM
Subject: RE: Changes to Continuing Education
Date: Monday, January 15, 2024 10:16:47 AM

Thank you for your message. Oregon licensees continue to have the option to attend and apply for approval of any CE program that fits the set criteria for approval. The rule did NOT change the licensees ability to apply for education approval.
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

Additionally, the Board expanded the number of accreditation agencies / organizations and regulatory authorities that are approved providers from four to nine. The expected outcome of this change is that licensees will have more approved CE options to choose from – and thus lessen the burden on licensees having to send in their own applications for approval.

Please see https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf

The portion of the rule you cite only restricts the number of **program providers** that may apply for program approval. We have restricted program approval to these Oregon based institutions because we have to reduce the volume of out of state and for profit organizations that are using our free approval process for their benefit – not the benefit of Oregon licensees.

As mentioned in my original email we get approximately 50 applications a month – the majority from **for profit program providers out side of the State of Oregon**. It is fiscally irresponsible and an inefficient use of Board resources to continue to approve these programs, when there are multiple accreditation services that exist entirely for this purpose.

Of note, if and when these out of state / for profit program providers go through the accreditation process and are approved by one of the enumerated providers, they will be approved for credit in Oregon.

Thank you for taking the time to submit your comment. The Board will review your and all comments received at their Feb. Board meeting. Your input is extremely valuable to the Board as they make these imperative and difficult decisions.

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

From: Heather Krebsbach <drheatherkrebsbach@gmail.com>
Sent: Sunday, January 14, 2024 4:19 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Changes to Continuing Education

Hi, I appreciate the conversation and I understand the necessity in altering the current process.

I am concerned and against the following statement:

- Limits entities eligible to apply for program approval to National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP)

IF this passes, I believe that it will greatly limit Oregon ND's education and scope of learning. NUNM and the OANP **should not,** be the only entities shaping our educational experience. Their annual CE offerings are not sufficient and do not encompass the wide spectrum of conditions many NDs treat. There are numerous other Oregon entities offering rich and valuable CE that should not be discounted.

Please reconsider this recommendation.

Thank you for your time.

Sincerely,

Heather Krebsbach, ND, LAc

Inner Gate Health & Wellness
NE Halsey Clinic Tel: 971-279-2294 Fax: 971-339-2971
Email: halsey@innergatepdx.com
www.innergatepdx.com
Facebook: http://www.facebook.com/innergatepdx

Prescriptions: Please contact your pharmacy for refills **at least 7 days** prior to running out of your prescription.

Emailing: If you are a patient, please help me manage the number of emails that I receive by keeping your questions to **3 sentences** and focusing on your **current treatment** plan. Thanks so much!

Confidential Communication: This message and attachment(s) are intended for the sole use of the individual and entity to whom it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended addressee, nor authorized to receive for the intended addressee, you are hereby notified that you may not use, copy, disclose or distribute to anyone the message or any information contained in the message. If you have received this message in error, please immediately advise the sender by replying to this email and delete the message.

From:	Shena Vander Ploeg
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
Date:	Sunday, January 14, 2024 11:51:26 AM

Mary-Beth-

Thank you your prompt reply.

I'll keep my eyes peeled.

Appreciate you and all that you do.

Yours in health,

Dr Shena Vander Ploeg

https://bio.site/DrShena

On Jan 14, 2024, at 10:45 AM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

Per this draft, if you have already completed the training IV required in the prior rule, you would only be required to take the Ozone training. However, this is just a draft rule, so please continue to monitor the website for any changes in the draft.

The Board will review your comments; thank you for providing your input.

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

From: Shena Vander Ploeg <shena.vanderploeg@gmail.com>
Sent: Saturday, January 13, 2024 9:06 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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

Hey there-

I had a question I didn't see clarified, regarding new rules proposed:

If we always have completed advanced IV training, but have not completed ozone... would we be able to add this after the rule by taking ozone specific CE or would we have to take the NPLEX parenteral exam?

Yours in health,

Dr Shena Vander Ploeg

> On Jan 12, 2024, at 4:52 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.
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>
> 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:

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

2. 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:
    1. Reduces the burden on licensees by eliminating licensee requirement to submit an application for approval
    2. Provide opportunities for Oregon licensees to learn from their colleagues about Oregon specific areas of practice
    3. Allow Oregon licensee hosts to create education that is directly related to CE requirements set in rule
    4. More efficient use of Board resources by reducing the number of approval applications from licensees for Board review.

3. Limits entities eligible to apply for program approval to National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP)
    1. Reduce the number of CE program applications for Board review that do not benefit the Oregon licensees
    2. Ensure Board resources are spent on approving program applications that serve a significant number of Oregon licensees
    3. 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
    4. 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.

4. 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:
    1. Increase transparency of what is required for licensee application approval
    2. Reduce the number of licensee re-submissions for Board review

3. Reduce the uptick in number of approval applications sent to the Board during the renewal period.
4. Increase quality of education due to set criteria for approval

5. 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:
    1. Increased transparency of what is required for licensee application approval
    2. Reduce the number of licensee submissions for Board review
    3. Reduce the uptick in volume of applications received in the renewal period.
    4. 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:

<!--[if !supportLists]-->1. <!--[endif]-->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:

<!--[if !supportLists]-->1. <!--[endif]-->Three (3) hours didactic education

<!--[if !supportLists]-->2. <!--[endif]-->Three (3) hours practical education

<!--[if !supportLists]-->2. <!--[endif]-->Removes requirement to complete lower body and lower body extremity training, prior to engaging in training for upper body and upper body extremity training.

<!--[if !supportLists]-->3. <!--[endif]-->Requires passage of Parenteral Medicine NPLEX elective exam prior to administering IV therapy

<!--[if !supportLists]-->4. <!--[endif]-->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

CRUMPLER Robin * OBNM

From: BAPTISTA Mary Beth * OBNM
Sent: Friday, January 19, 2024 1:40 PM
To: Dr. Kimberly Hindman N.D. L.Ac.
Cc: MEDICINE Naturopathic * OBNM
Subject: RE: Comments on changes to CE approval process

Thank you for your message. The Board will review all public comments at the Feb Board meeting. Please see my responses below to clarify areas of misunderstanding regarding the rules.

Thank you for taking the time to provide your valuable input to the Board, it is extremely helpful to them as they make these decisions.

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

From: Dr. Kimberly Hindman N.D. L.Ac. <khindman@healingdragon.net>
Sent: Friday, January 19, 2024 11:01 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Comments on changes to CE approval process

You don't often get email from khindman@healingdragon.net. Learn why this is important

I have concerns about the proposed amendments to the CE regulations.

The purpose is to make Oregon be “in line” with other regulatory agencies but Oregon NDs still have the highest CE hour requirements of providers in our region. Oregon MDs are required to have 30 hours/year and Washington and California NDs have 60 hours every 2 years (30 hours/year). Reducing Oregon ND hour requirements by 5 hours per year for 1200 active licensees would be a significant reduction in the amount of applications, reducing the work for the Board, and bring Oregon “in line” with the requirements of our neighboring states.

The language of the amendments says the changes would limit “entities eligible to apply for program approval to National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP).” This means that CE provided through Oregon Health Authority and American Association of Naturopathic Physicians (AANP) would not be accepted which doesn’t make any sense.

That is completely incorrect. Please read the rules in their entirety. https://www.oregon.gov/obnm/Pages/Notice-of-Proposed-Rules-for-Public-Comment.aspx

The new rule limits the **entities eligible to apply for approval**. But does not limit licensees to only submitting CE from these two entities. Conversely, the rule changes will result in an expansion of approved providers, from 4 to 9 (including OHA). Significantly reducing the burden on licensees to have to apply for approval for courses, in particular /e.g. mandatory courses like pain management. https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf

The rule also ensures that Oregon Licensed NDs can continue host programs relevant to Oregon scope of practice. Oregon licensees who host live / in person programs attended by a minimum of 10 licensees may apply for approval. The rule does not change the ability for individual licensees to apply for credit for programs attended – but not approved by Board by rule. https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

Additionally, the rules continues to allow licensees apply for approval for qualifying activities.https://www.oregon.gov/obnm/Documents/Rules/Amend%20850.040.0230.pdf

I have used US Pharmacist, an online CE resource, when additional hours of CE are needed and this resource is used by the National Association of Boards of Pharmacy. Would this still be allowed under the licensee self-directed activities as it is a nationally recognized source of CE? If not, then the OBNM is potentially severely limiting resources for CE for licensees even with nationally recognized sources of high quality CE while still maintaining the highest number of CE hours required in our region.

Again, please see the draft rule, the Board maintained the current list / did not remove (b) American Council on Pharmaceutical Education (ACPE). The new rule also adds Oregon Board of Pharmacy as approved education. https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf. And to repeat – the rule allows any individual licensee to apply for approval of course attended not approved by the Board by rule. https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

The language states that the changes allow "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". I have been in a group of Oregon NDs for the last 10 years that has met monthly and provided me exactly what the amendment says: "the opportunity to learn from their colleagues about Oregon specific areas of practice". However, we have several members who are in various parts of Oregon or live outside of Oregon but hold active Oregon licenses. Requiring the program to be in-person now eliminates this group as an option for CE unless we find more members because we would not have 10 members in person. This also means that those NDs who live outside the Portland area are now unable to access this source of CE and penalizes them simply for their location. We have not seen any decrease in the quality of presentations or discussion within the group from when we had to change to virtual meetings due to the pandemic and virtual meetings allows people a much greater degree of flexibility in scheduling CE. I do not see how requiring these meetings to have 10 NDs in person changes the quality of the CE. If all 10 of the NDs do hold current Oregon licenses, then this source of CE clearly benefits a significant number of Oregon-licensed NDs, which appears to be one of the goals of these changes.

Question – are these meetings "live" as in zoom / teams meeting –and all participants engaged in the discussion together? To reiterate, the rules continues to allow licensees may apply for approval for qualifying activities.https://www.oregon.gov/obnm/Documents/Rules/Amend%20850.040.0230.pdf

Kimberly Hindman

Dr. Kimberly Hindman

Naturopathic Physician, Licensed Acupuncturist

9320 SW Barbur Blvd, Suite 165
Portland, OR 97219
503.784.1027
www.healingdragon.net

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Sent with Proton Mail secure email.

CRUMPLER Robin * OBNM

From: Ilana Gurevich <ilana.gurevich@gmail.com>
Sent: Wednesday, January 24, 2024 4:09 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: FW: Purposed changes for CE feedback

Thanks Mary Beth.

I do think when people are looking to take CE especially if it's close to the end of the year they are always looking for how many CEs are being offered. So I think it might be harder to get attendance if we aren't stating how many CEs will be granted and relying on participants to apply for credits themselves.

There is already a culture of I attend a class and then I get CE credits for it.

Thanks for reading the emails. We really appreciate you're hard work!

On Wed, Jan 24, 2024 at 4:04 PM MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

> Thank you for taking the time to provide your public comment. Your input is extremely valuable to the Board.
>
> I wanted to specifically respond to the following statement:
>
> The new purposed rules would not allow us to apply for CE credits in the state of Oregon. Since we have such small classes and they fill up so quickly it is often that we don't have any Oregonians in our class, or that we also only have 1-2 Oregon based attendees.
>
> If the CE course you provide dips below 10 Oregon licensees, the Oregon licensees that attend your course will still have the option to apply for credit for attending your course. The process would be slightly different because it is under 10 participants; but if it otherwise qualifies for CE, licensed attendees would still be eligible to apply for credit.
>
> The Board staff would work with you to determine the most efficient manner for the Oregon attendees to apply and receive credit.
>
> https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf
>
> (1) Licensee attendees: Licensees may apply for approval of a completed structured continuing education program not accredited, provided, or approved per 850-040-0215, that meet the criteria set forth in 850-040-0230. Licensees must submit the following no later than 30 calendar days after the date of completion: (a) Completed application for approval provided by the Board (b) Certificate of Completion, including course date and total number of hours completed (c) Syllabus or course outline (d) Sample course materials (10 pages max) (e) Curriculum vitae or resume for each presenter (f) Additional information or materials at the request of the Board
>
> Again, thank you for taking the time to comment. Please let me know if you have additional questions.
>
> **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

From: Ilana Gurevich <ilana.gurevich@gmail.com>
Sent: Wednesday, January 24, 2024 1:09 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Purposed changes for CE feedback

Hi,

I am an Oregon licensed naturopathic physician who also lives in the state of Oregon. I also teach CE courses and have for years. The majority of the courses that I teach are small group hands-on sessions.

We cap our attendees to 10-12 per session. We will have attendees come from Oregon but also from the remainder of the country.

The new purposed rules would not allow us to apply for CE credits in the state of Oregon. Since we have such small classes and they fill up so quickly it is often that we don't have any Oregonians in our class, or that we also only have 1-2 Oregon based attendees.

Instead of limiting who can apply for CE based on the amount of people from Oregon that are attending.. I would recommend charging a fee for CE credits.. This would at least increase the revenue of the organization.

Thanks!

--

Dr. Ilana Gurevich
Naturopathic Physician
Licensed Acupuncturist

(503) 701-8766
Or
https://www.schedulicity.com to schedule

Seeing patients at:

Kwan Yin Healing Arts Center
2330 NW Flanders St
Suite 101

Portland OR 97210

Kwanyinhealingarts.com

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--
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CRUMPLER Robin * OBNM

From: mhicks@synaptic.care
Sent: Wednesday, January 24, 2024 10:18 AM
To: MEDICINE Naturopathic * OBNM
Subject: CE Approval Process Changes

Hello,

I am writing to express my thoughts and concerns regarding the proposed rule changes to the CE-approval process changes. I appreciate the reasoning outlining the purpose of the proposed changes and agree that some changes are necessary. Furthermore, I deeply appreciate that the board offers a free-to-licensees process at all, which is somewhat unique as far as I know among licensing boards and provides a much need means of accessing the unique types of CE that naturopathic physicians need relative to other types of professions. However, I would like to suggest some alternatives that would better suit the board and licensees.

First, the board processes far too many applications, in part, because the application process is clumsy. In 2024 there is an abundance of software automations that could drastically reduce your workload.

- Making already approved courses easily accessible to find will reduce duplicates. I know for a fact that many NDs, including myself, submit these applications for courses that other NDs have already gotten approval for, because it is difficult and cumbersome to find a list of approved courses, and the list itself is not easily searchable (I also don't bother reporting my CE as "pre-approved" in the portal because I can never find anything in that messy and unsearchable dropdown menu).
- Once the list of pre-approved courses list is easily accessible and searchable, the first first step on the application should be to search the list and attest that the following application is indeed for a new course.
- Stop using outdated PDF processes. I realize as a government agency you may not have total control over what software services you have access to, but to name a few examples to consider, Jotform, Airtable, and PandaDocs offer relatively simple form building software that can run all kinds of automations, reports, approval/disapproval processes. This can include compiling information for display on a website.

I would also suggest that rather than barring all but NUNM and OANP from using the service, that you charge a reasonable fee to for-profit organizations for the approval process and continue offering it for free to non-profit organizations (at least those based in Oregon or run by Oregon licensees). You might also consider limiting the number of applications or CE hours a licensee can submit per year. It's probably best that any licensee diversify their CE courses anyway to include conferences and conventional CEs that are accredited by other means.

In summary, I believe many of the concerns expressed around the need for these changes can be alleviated by working smarter rather than harder or by reduced access to services. Speaking from experience I can say that setting up the type of systems I have proposed can be a little bit more work on the front end, but once they are working they will drastically reduce the amount of button clicks, document reading, and general workload for everyone involved.

Thank you for your consideration,

Matthew Hicks, ND, MS
President
Synaptic Institute
Integrative mental health clinic

Entheogenic medicine training programs

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, January 25, 2024 11:07 AM
To: lwardselinger@wildflowernaturalmedicine.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Question about upcoming changes

Thank you for your message. Your input is very helpful to the Board as they make these difficult decisions.

The intent of the rule is to make sure the Board is only approving courses that benefit Oregon licensees. The current rule states to get Board approval, program providers must have proof of attendance by an Oregon licensee. Unfortunately, this lead to for-profit program providers paying for one attendee so they could get free approval from the Board. Obviously, this did not help our situation of being overwhelmed by CE applications. The intent of changing the rule was to allow small programs to continue, but ward off against providers using this loophole.

The board has received comments similar to yours regarding the number of participants required for approval being too high. We will take your comment and the other comments into consideration in whether to make changes to accommodate the smaller programs. But rest assured, we do want to make sure programs like yours are approved in the most efficient way possible.

Questions, please let me know. Thank you

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

From: Lauren Ward-Selinger <lwardselinger@wildflowernaturalmedicine.com>
Sent: Wednesday, January 24, 2024 6:00 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Question about upcoming changes

You don't often get email from lwardselinger@wildflowernaturalmedicine.com. Learn why this is important

Hello,
This is regarding https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

I am wondering if you have a CE event that is less than 10 attendees, that this rule change implies. Does it mean that the organizer cannot submit for CE approval if less than 10 attendees, or that individuals must submit for approval on their own?

The second option sounds redundant and more wasted time for board members. The first option (no approval process for less than 10 people) would just be a bummer since I have a CE club that meets once a year and it is usually 6 people. ;)

Clarification would be helpful in this case. Otherwise I think the rule changes seem very appropriate. Thanks so much for your time!

Lauren Ward-Selinger

CRUMPLER Robin * OBNM

From: Angela Cortal <angelacortal@gmail.com>
Sent: Monday, January 29, 2024 8:26 AM
To: BAPTISTA Mary Beth * OBNM
Cc: MEDICINE Naturopathic * OBNM
Subject: Re: FW: My public comment re: OBNM PROPOSED CONTINUING EDUCATION RULES

You don't often get email from angelacortal@gmail.com. Learn why this is important

Thank you for the invitation and opportunity.

On Sat, Jan 27, 2024, 4:24 PM BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov> wrote:

I think a phone call would be helpful. I really do want to understand where you are coming from. Please give me the best number to reach you and I will call you on Tuesday at 930.

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

-----Original Message-----
From: Angela Cortal <angelacortal@gmail.com>
Sent: Friday, January 26, 2024 5:27 PM
To: BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov>
Cc: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: Re: FW: My public comment re: OBNM PROPOSED CONTINUING EDUCATION RULES

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

Hello Mary-Beth,
Thank you for taking the time to respond. I would be more than happy to be wrong.
I can't make the 2/12 meeting, I'm actually teaching one of the courses I mentioned that week.
I will make some time available next week, I would like nothing further than to be set straight :) I can be available for a phone call Tues 1/30 around 9:20 or 9:30 am.
Thank you for your consideration,
Angela

On Fri, Jan 26, 2024 at 5:04 PM BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov> wrote:

>
> Thank you for taking the time to submit your comment. The Board and I appreciate your input.
>
> I think we still may be missing each other on the impact of the rules on Oregon licensees / licensees who provide CE. I would be happy to schedule a call with you to hear your concerns and discuss it further. I am open from 930-11am, Tues-Thurs next week. Please let me know if any of those days / times work for you.
>
> Otherwise, the Board will review all comments at the Feb. 12 meeting. The meeting is open to the public and you are welcome to attend.
> https://www.oregon.gov/obnm/Pages/Board-Meetings.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
>
> -----Original Message-----
> From: Angela Cortal <angelacortal@gmail.com>
> Sent: Friday, January 26, 2024 1:07 PM
> To: MEDICINE Naturopathic * OBNM
> <naturopathic.medicine@obnm.oregon.gov>
> Subject: My public comment re: OBNM PROPOSED CONTINUING EDUCATION
> RULES
>
> [You don't often get email from angelacortal@gmail.com. Learn why this
> is important at https://aka.ms/LearnAboutSenderIdentification]
>
> 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: Karma Denmark <drdenmark@gmail.com>
Sent: Friday, January 26, 2024 12:19 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE changes esp online

You don't often get email from drdenmark@gmail.com. Learn why this is important

I don't support the proposed CE changes. They are restrictive and harsh. I urge the board to consider the importance of online CE opportunities, especially for specialized categories which pose the strictest requirements for Oregon licensees.

Dr. Karma L Denmark

Naturopathic Physician
2008 Willamette Falls Drive, Suite 200
West Linn, OR 97068
Ph: 503-607-0018
F: 503-723-5112

CRUMPLER Robin * OBNM

From: Kayla Preece <kpreece1985@gmail.com>
Sent: Saturday, January 27, 2024 10:49 AM
To: MEDICINE Naturopathic * OBNM
Subject: ND CE changes

You don't often get email from kpreece1985@gmail.com. Learn why this is important

I don't agree with the proposed CE changes. I want access to more pre-approved opportunities, not fewer. Please amend these changes so that there are inclusive and diverse pre-approved CE opportunities for Oregon licensees. While I am presently not practicing in OR, I intend to in the future. When I was on the WANP board in WA, similar restrictive changes were made to CE. I know it allowed WANP to earn more money but does not help the profession.

Kayla

CRUMPLER Robin * OBNM

From: Lori von der Heydt <lori.vonderheydt@gmail.com>
Sent: Monday, January 29, 2024 5:49 PM
To: MEDICINE Naturopathic * OBNM
Subject: Comment on CE approval process changes

Dear Board members-
Thank you for your efforts to minimize your time and expense reviewing CE applications for approval. I am in favor of efficiency! But, I wonder if the changes you submit will be effective in reaching the proposed goals of increased cost efficiency, economical use of staff and Board resources, and improved quality of a process and education, or if, similar to your rule change two years ago, they will not have the desired outcome.

I read in your 2023-2025 budget narrative that OBNM is receiving the greatest number of calls ever from the public about naturopathic medicine as primary healthcare. People are wanting something different than the allopathic model. That is great news! Yet, more often than not, a new patient comes to me after working with another ND who recommended a boat load of nutritional supplements which serve only to address symptoms instead of the cause. The patient is burned out on taking all these supplements and doesn't feel any better. This is allopathic medicine. Where did we fail to educate this naturopath?

Part of our failing, I submit, is in our continuing education. Part of the Board's mission is to assure quality education. How do you define quality education? Quality education comes from esteemed colleagues, guided by naturopathic principles and standards rather than conventional allopathic standards. It is sometimes 'radical', in opposition to allopathy. How are naturopaths supported in their craft if they are limited to an 'expanded' conventional/allopathic accreditation provider list?

Under the new ruling, the licensee's ability to apply for CE approval does not change. But both the licensee's time applying for approval and the board member's time spent processing the request, increases. For 2023, 2022 and 2021, I would have had to apply for approval for 29.5hrs, 17.5hrs and 20hrs, respectively, if the new ruling was in place. I realize contributing to licensee's administrative efficiency is not part of your mission but this new ruling seems to be a lose-lose for the licensee and the board members.

Oregon licensees require CE that is diverse, supports their craft, is easily accessible and affordable. How do other Boards budget for the CE approval process? Is there a way for all Boards to share in the financial burden? Is there a way to have reciprocity with other Boards who provide approved CE coursework? I appreciate the quality coursework made available by various CE providers, especially by Consultdranderson.com. How can we make this a win-win-win for OBNM, Oregon licensees and for profit CE providers?

The public is requesting a naturopathic approach to healthcare more than ever. OBNM has a great opportunity to support this request by enabling easily accessible, quality continuing education opportunities commensurate with naturopathic principles of medicine.

Thank you for reading and considering my comments.

--
Lori von der Heydt, ND
4445 NE Fremont
Portland, OR 97213
503-708-5742
vonderheydt@beaumonthealthcare.com

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CRUMPLER Robin * OBNM

From: Karmen Geller <drgeller@milwaukienaturalmedicine.com>
Sent: Monday, January 29, 2024 4:10 PM
To: MEDICINE Naturopathic * OBNM

You don't often get email from drgeller@milwaukienaturalmedicine.com. Learn why this is important

Dear OBNM,

Please do not approve the proposed rule to change the CE approval process!!

I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.

--
Karmen Geller, N.D., L.Ac.

Milwaukie Natural Medicine, LLC
www.milwaukienaturalmedicine.com
6501 SE King Rd. Milwaukie, OR 97222

Tel: (503) 863-5939
Fax: (503) 788-8020
Email: drgeller@milwaukienaturalmedicine.com

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CRUMPLER Robin * OBNM

From: Seroya Pauline Crouch ND <seroya@onemedicine.org>
Sent: Thursday, February 1, 2024 12:20 PM
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

Hello,
First of all, thank you to staff and board members past and present for all your hard work on behalf of our profession!

I am happy to learn of NANCEAC and FNMRA. Our profession has needed something like those organizations for a while now.

Having been licensed in Oregon since 1985, I have attended many CE presentations which have sometimes varied wildly in quality of content and presentation. Therefore I applaud the NANCEAC educational quality standards and approval process.

I have submitted a few specific comments and concerns below under the relevant sections of the summary email. I have also read the draft rule change documents.

Thank again for you service.

Seroya Pauline Crouch, ND, CIP

Naturopathic Physician

Certified CoreIndividuation™ Practitioner

One Medicine Integrative Health

Seroya Crouch ND LLC

126 Main Street, Level 2

Putney, VT 05346

802.387.0124

http://www.onemedicine.org

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On Jan 12, 2024, at 7:49 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 tonaturopathic.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 **AGREE**

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 **AGREE**

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 AGREE This is a profession-wide issue.

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

I would also like to see the following accrediting bodies be included in this list:

1. American Psychological Association They are the profession-wide body for CE approval for psychologist. They approve a wide variety of programs that are of interest and relevance to NDS. This includes: Spirituality, Pain management, Death, Grief and suicidology, Anxiety and Depression, Addiction, Neuropsychology, Energy Psychology, etc.

2. American Association of Nurse Practitioners Certification Board- they accredit CE on a wide variety of topics that may be of interest to NDs.

- Allows Oregon licensees that host a live, in-person, structured continuing education program, in the State of Oregon, attendedby a minimum of ten (10) Oregon licensees, to apply for approval on behalf of the licensed attendees. Expected Outcome: **AGREE**
    - 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) DISAGREE**
    - 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.

I think that NUNM and OANP should be eliminated from this list, and become accredited providers through NANCEAC rather than submitting courses for approval to the board. This would greatly reduce the workload for the board, and likely benefit NDs from other states as well, since the CE would be approved.

NaturopathicCE, the AANP, Psych ANP, OncANP, Ped ANP and other colleges and national and regional ND organizations should also become accredited providers through NANCEAC.

- 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: **AGREE**
  - 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

Having document upload capability, rather than using email, would greatly simplify this process and save staff time.

- 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: **AGREE**
  - 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.

One other concern that is unclear based on the rules I read online and this document:

A. Many NDs in unlicensed states hold a license in Oregon. The draft rule changes seem in increase the emphasis on Oregon-based CE. I recommend that the final rules allow:

- **PRE-RECORDED Online CE (that has been approved by a suitable body)**
- **LIVE Online CE (that has been approved by a suitable body)**
- **IN-PERSON CE (that has been approved by a suitable body)**
- **Other state-assocation approved events - if scope is similar- e.g. WA, AZ, VT, AK, etc.**

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

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 1, 2024 10:04 AM
To: MEDICINE Naturopathic * OBNM; dranne@doctorannehill.com
Subject: RE: FW: FW: proposed changes for CE feedback

Thank you - your input is helpful. We will absolute discuss this at the meeting on the 12th.

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

-----Original Message-----
From: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Sent: Thursday, February 1, 2024 8:33 AM
To: BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov>
Subject: FW: FW: FW: proposed changes for CE feedback

-----Original Message-----
From: Anne Hill <dranne@doctorannehill.com>
Sent: Thursday, February 1, 2024 5:45 AM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: Re: FW: FW: proposed changes for CE feedback

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

Thank you for your clarification.

I am still seeing the issue as simply that I cannot compete with larger seminar offerings that can obtain pre-approved CE.

This new rule will put the burden of obtaining CEs onto the students themselves and may be a deterrent for Oregon licensees to want to attend my classes if they do not know if they will be able to obtain credit for them or need to fill out extra paperwork before knowing if they can attend and receive credit.

Surely, receiving 5-9 applications from students who may want to attend my seminar will be a larger burden on the Naturopathic board then one application being filled out by the educators themselves.

Again-I see this new rule as being a barrier to my ability to do business and to hold seminars for our local Oregon Licensed Naturopathic Physicians.

Potential students may opt to only go to larger pre-approved seminars if the CEs are guaranteed and it will put my classes and other smaller classes (many also held by other Oregon licensed physicians) in jeopardy of being able to offer them without pre-approved CEs

Our ability to compete with larger seminars will simply be more difficult, and in my opinion, is not in alignment with supporting our local Naturopathic professionals who are holding these smaller trainings.

Other options:

Perhaps if a seminar is held within the state of Oregon that it may be a good option to allow these educators to be able to obtain credit regardless of how many Oregon attendees are there?

Or perhaps if the seminar is being held by a Local Naturopathic physician then you will consider allowing us to apply for CE regardless or who is in attendance?

These other options would show that the Oregon board can help to support our local physicians and educators-regardless of the amount of attendees from Oregon.

I do hope you will reconsider this proposed change.

Thank you, Anne Hill, ND

On 1/30/24 12:47 PM, MEDICINE Naturopathic * OBNM wrote:
> Thank you for the follow up information. I must not have been clear with my messaging because many licensees in your position have been asking the same question.
>
> To clarify - the proposed rule allows an Oregon licensee who hosts a live CE program in Oregon, that is attended by 10 or more Oregon licensees, to apply for approval of the completed program on behalf of the attendees. The host does not get to apply in advance for approval. The intent of the proposed rule is to reduce the need / number of licensees who attend larger programs from having to submit individual licensee applications for the approval after completion. If the program you host is attended by less than 10 licensees, then one of the licensees may apply individually for course approval.
>
> ----
> See proposed rule:
>
> (2) Licensee Program Host: Licensees who host a live, in-person, structured continuing education program, in the State of Oregon, attended by a minimum of ten (10) Oregon licensees, may apply for approval on behalf of the attendees by submitting the following no later than 30 calendar days after the date of completion:
>
> (a) Materials listed in Section 1
>
> (b) Participant sign-in sheet showing attendance of a minimum of ten (10) Oregon licensees.

>
> (c) Copy of the certificate of completion for a minimum of ten (10)
> Oregon licensed attendees
> ----
> Of note, due to the volume of comments on this particular section of the proposed rule, the Board may reconsider the required 10 licensees; and may discuss whether preapproval is more efficient.
>
> Please let me know if you have additional questions or comments on this section or any section of the rules. The Board will review all comments at the Feb. 12 public meeting.
>
>
>
>
>
> 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
>
>
>
>
> -----Original Message-----
> From: Anne Hill <dranne@doctorannehill.com>
> Sent: Monday, January 29, 2024 10:56 AM
> To: MEDICINE Naturopathic * OBNM
> <Naturopathic.MEDICINE@obnm.oregon.gov>
> Subject: Re: FW: proposed changes for CE feedback
>
> [You don't often get email from dranne@doctorannehill.com. Learn why
> this is important at https://aka.ms/LearnAboutSenderIdentification]
>
> Hi there-thanks for getting back to me.
> yes-I teach small hands on sessions in Portland, Oregon.
>
> The issue would be-lots of people only sign up for courses within the last month or two before the class. I would like to be able to let people know that my classes are approved for CE months in advance. But if I don't know how many people are coming from Oregon vs other states this this will make this process more difficult for me and also for you as I will likely not be able to get the application sent in the amount of time that you require by the time I have an appropriate class count for Oregonians vs non-Oregonians.
>

> I guess how things are written it is not clear to me how I can apply for credit if I have less than 10 Oregon Attendees-is it a separate application process? If so-then this would be something that I might not know until 2 weeks prior to the class being offered what the head count will be.
>
> Thank-you, Anne Hill
>
> On 1/29/24 10:37 AM, MEDICINE Naturopathic * OBNM wrote:
>> Thank you for your message. The draft rule changes would absolutely not prohibit you from getting CE approval / credit for your course. The process would just be slightly different if you had less than 10 Oregon licensees. The Board is also reviewing public comment regarding changing / reducing the number of participants required for local program approval.
>>
>> Question to help us as we go forward - you state "The majority of the courses that I teach are small group hands-on sessions." Does that mean your courses are in person and held in the State of Oregon?
>>
>> Additionally, charging for CE approval would just add an administrative layer to the process, and not garner the funds necessary to cover the expenses.
>>
>> Thank you for taking the time to submit your comment. Your feedback is extremely helpful to the Board as we move 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
>>
>>
>>
>> -----Original Message-----
>> From: Anne Hill <dranne@doctorannehill.com>
>> Sent: Saturday, January 27, 2024 2:32 PM
>> To: MEDICINE Naturopathic * OBNM
>> <naturopathic.medicine@obnm.oregon.gov>
>> Subject: proposed changes for CE feedback
>>
>> [You don't often get email from dranne@doctorannehill.com. Learn why
>> this is important at https://aka.ms/LearnAboutSenderIdentification]
>>
>> To the board,
>>

>> I am an Oregon licensed Naturopathic Physician who also lives in the state of Oregon. I teach CE courses in Craniosacral therapy and Neural injection therapy and have for years. The majority of the courses that I teach are small group hands-on sessions.
>>
>> I cap attendees to 10-16 per session and I cannot always predict that percentage. The majority of my students do come from Oregon with a few from the remainder of the country. But for some classes I do end up having a greater mixture of a percentage of students from other states vs Oregon.
>>
>> The new purposed rules would not allow me to apply for CE credits in the state of Oregon. This would severely impact my ability to do business teaching some of these well known and loved specialties to our local Naturopathic Physicians. This does not serve me or support my business, nor does it serve my fellow Oregon Naturopathic physicians in seeking smaller local classes to attend to get CE.
>>
>> Instead of limiting who can apply for CE based on the amount of people from Oregon that are attending, I would recommend charging a fee for CE credits. This would at least increase the revenue of the organization and help to support our local teachers and students.
>>
>> Thank-you
>> Anne Hill, ND
>>
>>

From:	MEDICINE Naturopathic * OBNM
To:	Dr. Reynolds; 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
Date:	Saturday, January 13, 2024 12:01:20 PM

Thank you for your message. The Board will review your comments at the February meeting. I anticipate the Board will make additional changes to the rules based on all the public comments. So please continue to monitor the website page.

Of note, if you look at the email I sent, the "expected outcomes" for almost every one of these changes is the process will be far less onerous on the licensee. The expectation is that these rules will reduce the number of applications licensees will need to submit for approval. We expanded the number of pre-approved providers to choose from and continue to provide approval for in state / licensee driven programing.

As for Paul Anderson and other for profit out of state CE providers, they have ample options to get their CE approved through accreditation agencies listed in the proposed rule. When they complete that process and are approved, all licensees will need to do is take their course and upload their certificate.

As explained exhaustively in the email, the Board does not have the resources or expertise to effectively handle the volume of the applications from out of state / for profit providers when there are many options for approval from organizations that exist specifically for this purpose.

Thank you for taking the time to comment. Your input is extremely valuable to the Board as we make these difficult decisions and choices.

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

From: Dr. Reynolds <drreynolds@oregonnaturalmedicine.com>
Sent: Saturday, January 13, 2024 6:35 AM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
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 Mary et al

Thanks for looking at this. The issue sounds complex and I am sure the board is feeling overwhelmed with things. This sounds though as if it is all about making the boards job easier and not licensees. I am all about making the boards life easier and I totally understand that our board works tirelessly and I think some of this makes senses but I am not sure I understand how this will affect the licensee/applicant. My intuition is that is will make our lives harder and finding CEs more difficult and expensive.

It may not be popular with the board but shouldn't the focus be on making applicants/licensees live's easier. Isn't this one of the roles of the OBNM? Right now I have licenses in Washington and Oregon and Oregon is a much more archaic and tedious process. It dumbfounds me every year when I apply how long it will take me to complete my application and then how quickly it is actually approved (the latter is great).

I am all for making the boards life and job easier. I think more staffing and stringent qualifications make sense but I also use out-of-state for profit CEs and don't want to see them go away and my options to be limited. For instance I use Paul Anderson CEs which are AANP approved. They are fantastic as most of you can attest to....but they are never preloaded in the system and they are often 1-2 hrs.So I have to type in line by line all of the info.

So one question is...How will this affect me using those and for poor Paul to get them approved since he by definition is an "out—of-state, for profit organization "? My concern is we are focused on limiting organizations that the board thinks may be providing sub optimal education but it could have a chilling affect for those that don't. I also think it is not trusting of our applicants....who are doctorate level professionals.

Already, the process is so antiquated. I never understand why this process is so tedious and time consuming.My Washington license is every 2 years and takes no time to complete. Oregon.....well it is massively time consuming, has to be done yearly and as I can't hand this off to someone it is my time that is consumed.

This leads me to a another question. Why are AANP credits not automatically approved? I mean is there a question that someone who attends the AANP is getting subpar continuing education? What about Paul Anderson? What about courses that are taught at other institutions and recorded such as at Bastyr? It seems like we are putting all our

trust in OANP and NUNM to educate us. This is both exclusive (which is never good) and short sighted. Why are these institutions the ones we can just check off and others are subject to a strenuous background checks? Why not have other institutions (for a cost) apply to become an accredited supplier of CEs (such as Anderson, Bastyr, Sonora etc). As for AANP.....let's get real...just apply them. I attended AANP this year and it was no different than OANP credits. Let's support both our state and national organizations....if we can't trust AANP we are in a sad state. Maybe we do but why do I have to type everything in by hand....are we really that distrustful of applicants?

As for time to apply....oh brother! Rt now it takes me 1.5 hours or more to apply for my license bc I have to enter every Ce (often 1 or 1.5 credits) at a time. Maybe I am doing this wrong but I think they need to be hand entered(if I'm wrong please tell me to simply my life). Why not just ask applicants if they have completed the necessary credits or have them upload their CE certificates (even this is ridiculous and time consuming though). The system should be made easier ...absolutely for our hard working board but also for the applicants. There is no way that our MD and DO counterparts have to line by line enter every CE. My mother is a nurse practitioner and I know she doesn't have to do this and can apply every two years (around 38 ce hours every 2 years!) Why not just ask docs if they have completed their CEs, make them sign that they need the required hours of each category (10 pharmacy, 2 ethics etc)....then audit 10%. If a person doenst have them...then there are consequences.

I like many of my counterparts actually love doing CEs , meeting up for AANP and learning new things. I am always amazed at doctors like Dr.Anderson and others who are using innovative things in the field. It makes our profession stronger. But making things harder for some CE providers to get approved and making less options for licensees is probably not a great idea. More relevant I think is to make the process easier for we the applicants....stream line it and for gods sake look at an every 2 year license like our Washington and Oregon MD counterparts have.

Thank you for your time and dedication

John Reynolds, ND

> On Jan 12, 2024, at 7:50 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:

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

2. 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:
    1. Reduces the burden on licensees by eliminating licensee requirement to submit an application for approval
    2. Provide opportunities for Oregon licensees to learn from their colleagues about Oregon specific areas of practice
    3. Allow Oregon licensee hosts to create education that is directly related to CE requirements set in rule
    4. More efficient use of Board resources by reducing the number of approval applications from licensees for Board review.

3. Limits entities eligible to apply for program approval to National University of Naturopathic Medicine (NUNM) and Oregon Association of Naturopathic Physicians (OANP)
    1. Reduce the number of CE program applications for Board review that do not benefit the Oregon licensees
    2. Ensure Board resources are spent on approving program applications that serve a significant number of Oregon licensees
    3. 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
    4. 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.

4. 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:

1. Increase transparency of what is required for licensee application approval
2. Reduce the number of licensee re-submissions for Board review
3. Reduce the uptick in number of approval applications sent to the Board during the renewal period.
4. Increase quality of education due to set criteria for approval

5. 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:
    1. Increased transparency of what is required for licensee application approval
    2. Reduce the number of licensee submissions for Board review
    3. Reduce the uptick in volume of applications received in the renewal period.
    4. 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:

1. 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:
    1. Three (3) hours didactic education
    2. Three (3) hours practical education
2. Removes requirement to complete lower body and lower body extremity training, prior to engaging in training for upper body and upper body extremity training.
3. Requires passage of Parenteral Medicine NPLEX elective exam prior to administering IV therapy
4. 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

CRUMPLER Robin * OBNM

From: Crystal Hannan, ND <dr.crystal@inhealthclinic.com>
Sent: Wednesday, January 24, 2024 9:37 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed CE changes

You don't often get email from dr.crystal@inhealthclinic.com. Learn why this is important

- I don't agree with the proposed changes. I want access to more pre-approved opportunities, not fewer. Please amend these changes so that there are inclusive and diverse pre-approved CE opportunities for Oregon licensees. I urge the board to consider the importance of online CE opportunities, especially for specialized categories which pose the strictest requirements for Oregon licensees.

Crystal Hannan, ND
In Health Naturopathic Medicine
503-357-3074
www.InHealthClinic.com

CRUMPLER Robin * OBNM

From: Krista Anderson-Ross <kandersonrossnd@gmail.com>
Sent: Wednesday, January 24, 2024 8:49 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed CE changes

You don't often get email from kandersonrossnd@gmail.com. Learn why this is important

- I don't support the proposed CE changes. They are restrictive and harsh. I urge the board to consider the importance of online CE opportunities, especially for specialized categories which pose the strictest requirements for Oregon licensees.
-
- I urge the board to consider Naturopathic CE as an approved provider for continuing education. Naturopathic CE has been an online CE provider for naturopathic doctors for nearly the past 10 years and has worked with OBNM the entire time. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.

Krista Anderson-Ross ND
Sent from my iPhone

CRUMPLER Robin * OBNM

From: La Botanica Clinic <la_botanica_now@yahoo.com>
Sent: Wednesday, January 24, 2024 6:48 PM
To: MEDICINE Naturopathic * OBNM
Subject: Changes to CE opportunities

You don't often get email from la_botanica_now@yahoo.com. Learn why this is important

- I don't agree with the proposed changes. I want access to more pre-approved opportunities, not fewer. Please amend these changes so that there are inclusive and diverse pre-approved CE opportunities for Oregon licensees.
- This will be very expensive, very limiting and even more limiting as a person of color. I like to have access to variety of online classes that represent people of color and cultures.
- Consider the harsh will do to our community of Naturopathic Doctors that rely in the Oregon license.
- Consider doctors that do not practice but keep their license with the extra expense and limited opportunities for CE.
- The need for options of CE available is of most importance.

Thank you for your consideration
Dr. Adriana Azcarate-Ferbel ND

CRUMPLER Robin * OBNM

From: Deborah McKay <drdebmckay@icloud.com>
Sent: Wednesday, January 24, 2024 6:25 PM
To: MEDICINE Naturopathic * OBNM
Subject: Please allow pre-approval for provider "Naturopathic CE"

You don't often get email from drdebmckay@icloud.com. Learn why this is important

Dear Friends:

I urge the board to consider "Naturopathic CE" as an approved provider for continuing education.

Naturopathic CE has been an online CE provider for naturopathic doctors for nearly 10 years and has worked with OBNM the entire time.

Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees; this entity should be available as a pre-approved CE provider for Oregon licensees.

Thank you for your consideration.

-Dr. Deb McKay
OR Lic #1444

Sent from my iPhone

CRUMPLER Robin * OBNM

From: Dr. Rachel Meredith <receptivemedicine@gmail.com>
Sent: Wednesday, January 24, 2024 2:39 PM
To: MEDICINE Naturopathic * OBNM
Subject: Please heed our call to keep more opportunities open

You don't often get email from receptivemedicine@gmail.com. Learn why this is important

- I don't agree with the proposed changes and I want access to MORE pre-approved opportunities, not fewer. Please amend these changes so that there are inclusive & diverse pre-approved CE opportunities for Oregon licensees. I urge the board to consider the importance of online CE opportunities, especially for specialized categories which pose the strictest requirements for Oregon licensees.
- I also urge the board to consider Naturopathic CE as an approved provider for continuing educatio as I have learned a lot form this site and found it to be the most inclusive for CE related to ethics and topicals about minorities.

Please let me know how else I can help this cause to bring more freedom and inclusivity to our continued education process.
warmly,
Be well, stay healthy!
Rachel Meredith ND LAc MSOM

CRUMPLER Robin * OBNM

From: Bonnie Wickwire <drwickwire@gmail.com>
Sent: Thursday, January 25, 2024 8:32 AM
To: MEDICINE Naturopathic * OBNM
Subject: Re Proposed Changes to CE

You don't often get email from drwickwire@gmail.com. Learn why this is important

- I don't support the proposed CE changes. They are restrictive and harsh. I urge the board to consider the importance of online CE opportunities, especially for specialized categories which pose the strictest requirements for Oregon licensees.
- I also believe that licensees, with the intent of caring for their patients with the latest and most sophisticated CE, should be able to CHOOSE the CE they desire to meet that goal as they have in the past.

Bonnie Wickwire

CRUMPLER Robin * OBNM

From: Dr. McKay, ND <admin@drdebmckay.com>
Sent: Thursday, January 25, 2024 8:55 AM
To: MEDICINE Naturopathic * OBNM
Subject: Please add more CE providers

You don't often get email from admin@drdebmckay.com. Learn why this is important

Dear OBNM Friends,

Yesterday I wrote to you asking to **add "Naturopathic CE"** to your list of pre-approved CE providers. These are fellow licensed ND's, for crying out loud -- who better to remind of who we really are?

Today I realize I should have added at least two more:
•**AARM, American Association for Restorative Medicine** (their conferences are excellent!)
•**PESI, Psychology Education Services** (great catalog of online courses for PhD psychologists)

And please, if there are CE providers who are already pre-approved by other licensing boards for ...
•licensed ND's in other states
•PhD psychologists (such as PESI)
•**MD homeopaths (such as CEDH and NESH)**
•licensed pharmacists
•advanced practice nurses
•holistic medicine practitioners (such as AARM)
•**functional medicine practitioners (such as IFM)**
...then for goodness' sake, INCLUDE THEM on your pre-approval list, and please don't work yourself to the bone by reviewing them individually.

I hate to see naturopathy "drifting" more and more towards mainstream allopathic standards because WE ARE DISTINCT AND SPECIAL.

We need to emphasize our special strengths, especially in our continuing education, life-long.

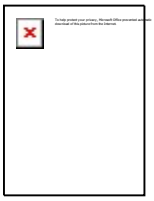
Hence the importance of emphasizing holistic, functional, homeopathic, herbal, and psychological education providers.

Thank you for your consideration!

Deb McKay, ND, FABNE
Fellow, American Board of Naturopathic Endocrinology
Oregon Lic. #1444

www.drdebmckay.com
503-549-5550, (Tel) *Open Tues. thru Fri.*
503-245-4507 (Fax)

7516 SW 25th Avenue, Portland, OR 97219



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CRUMPLER Robin * OBNM

From: lifeflowhealth <lifeflowhealth@yahoo.com>
Sent: Thursday, January 25, 2024 7:52 PM
To: MEDICINE Naturopathic * OBNM
Subject: Continuing Education

You don't often get email from lifeflowhealth@yahoo.com. Learn why this is important

Dear Sirs.

Please consider adding Naturopathic Ce to the approved continuing ed list. Specific seminars have already been approved by the board. I have found the information very interesting and easy to access. Many of them are taught by NUNM alumni. The seminars have been affordable. Thank you.

Dr. Kim Landi

CRUMPLER Robin * OBNM

From: Lisa Matejka, ND, MS <dr.lisa.matejka@gmail.com>
Sent: Thursday, January 25, 2024 10:42 AM
To: MEDICINE Naturopathic * OBNM
Subject: I Do NOT Approve

To whom it may concern,

As an Oregon ND licensee, I understand these proposed changes will negatively affect those of us licensees who practice out of state, which I do. I also understand that this process serves to limit the topics of CE's we readily have access to and there is already such an agenda to centralize this medicine and make it more conventional. I agree with these bullet points as well:

- I don't agree with the proposed changes. I want access to more pre-approved opportunities, not fewer. Please amend these changes so that there are inclusive and diverse pre-approved CE opportunities for Oregon licensees.
- I don't support the proposed CE changes. They are restrictive and harsh. I urge the board to consider the importance of online CE opportunities, especially for specialized categories which pose the strictest requirements for Oregon licensees.
- I urge the board to consider Naturopathic CE as an approved provider for continuing education. Naturopathic CE has been an online CE provider for naturopathic doctors for nearly the past 10 years and has worked with OBNM the entire time. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.
-

Lisa Matejka, ND, MS
New Moon Cancer Care
http://www.newmooncancercare.net
dr.lisa@newmooncancercare.net
(971) 319-0410
Rumble: Dr. Lisa Matejka

"Future medicine will be the medicine of frequencies." —Albert Einstein

For Florida Clients: As Florida has not issued licenses to NDs since 1959, Lisa Matejka, ND, MS, is not licensed in Florida. She is a licensed naturopathic physician in the state of Oregon. Given her educational training and experience, she works as a natural health consultant to Florida based clients. In addition to this, she has training as an energy worker as a separate modality offered.

CRUMPLER Robin * OBNM

From: Anne Hill <dranne@doctorannehill.com>
Sent: Saturday, January 27, 2024 2:32 PM
To: MEDICINE Naturopathic * OBNM
Subject: proposed changes for CE feedback

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

To the board,

I am an Oregon licensed Naturopathic Physician who also lives in the state of Oregon. I teach CE courses in Craniosacral therapy and Neural injection therapy and have for years. The majority of the courses that I teach are small group hands-on sessions.

I cap attendees to 10-16 per session and I cannot always predict that percentage. The majority of my students do come from Oregon with a few from the remainder of the country. But for some classes I do end up having a greater mixture of a percentage of students from other states vs Oregon.

The new purposed rules would not allow me to apply for CE credits in the state of Oregon. This would severely impact my ability to do business teaching some of these well known and loved specialties to our local Naturopathic Physicians. This does not serve me or support my business, nor does it serve my fellow Oregon Naturopathic physicians in seeking smaller local classes to attend to get CE.

Instead of limiting who can apply for CE based on the amount of people from Oregon that are attending, I would recommend charging a fee for CE credits. This would at least increase the revenue of the organization and help to support our local teachers and students.

Thank-you
Anne Hill, ND

CRUMPLER Robin * OBNM

From: Jared Zeff, ND <drzeff@aol.com>
Sent: Monday, January 29, 2024 12:17 PM
To: MEDICINE Naturopathic * OBNM
Subject: proposed changes in CE rules

You don't often get email from drzeff@aol.com. Learn why this is important

Dear OBNM,

Each year, now, I attend the Paul Anderson conferences, though this AAMP organization. This is very high quality CE. This has been approved by the OBNM in the past. As I read these new rules, this CE option would no longer be available. I write to oppose this change. I also attend the Naturopathic Medicine Institute CE, as well as a variety of CE offerings by other State Associations. As I read the new rules, these would no longer be acceptable. All these are approved by the NANCEAC, which has very high standards and is generally recognized by other licensing authorities. I would urge you to reconsider these changes and include these previously recognized sources of CE among those that will be acceptable for licensure requirements.

Respectfully,

Jared Zeff, ND
Oregon Lic #463

CRUMPLER Robin * OBNM

From: sb dr-brown.com <sb@dr-brown.com>
Sent: Monday, January 29, 2024 12:04 PM
To: MEDICINE Naturopathic * OBNM
Subject: Upcoming rules changes regarding continuing education

You don't often get email from sb@dr-brown.com. Learn why this is important

Dear Board members,

I am a currently licensed Oregon ND and I have concerns regarding proposed changes to CE approval rules.

I understand that CE approval takes up a lot of time for the Board, but the proposed rules would restrict CE approval to such a small spectrum of content creators that the variety of CE available would be unacceptably small, and much of it would be from non-naturopathic sources.

I am particularly concerned because these new rules would have rendered some of the 2023 CE that I found most interesting and useful, from vendors like NaturopathicCE.com, inadmissible to the requirements. A large part of my 2023 CE was in a naturopathic specialty in which I had never been educated, and it all would have been completely unapproved to me under the proposed rules. I strongly urge the Board to adopt reciprocity with other states, so that a wide variety of naturopathic topics can be made available without placing an undue burden on the Board.

Please feel free to contact me with any questions.

Thank you,

Shannon Brown

Shannon Brown ND LAc
Portland/Milwaukie, OR

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CRUMPLER Robin * OBNM

From: Michael Hummel <drhummelnmd@gmail.com>
Sent: Monday, January 29, 2024 10:43 AM
To: MEDICINE Naturopathic * OBNM
Subject: CE changes

To Whom It May Concern,

I just wanted to write a quick note that I am not in favor of the whole of the proposed rule changes regarding Naturopathic continuing education. I am concerned that many of my most loved CE options will be eliminated by funneling through certain organizations that are high cost for accreditation thus taking away or making far more costly core naturopathic CE options I have thus enjoyed so far. One of my favorite aspects of practicing in Oregon is the diversity I choose from for my continuing education. Although this rule expands in some ways it does limit in others. There needs to be a better win-win approach for the current excellent options available from AANP, Dr Anderson, and NaturopathicCE. All of these I have used and enjoy learning from. If we want to increase expansion then I think there are better ways to do so that are more inclusive.

Best,

Dr. Hummel

CRUMPLER Robin * OBNM

From: Kara Crisp <karacrispnd@gmail.com>
Sent: Monday, January 29, 2024 10:31 AM
To: MEDICINE Naturopathic * OBNM
Subject: Rule Changes

You don't often get email from karacrispnd@gmail.com. Learn why this is important

Dear OBNM,

- 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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.
- I don't support the proposed CE changes. They are restrictive and harsh. 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.
- I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.
- I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.
- I disagree with making any drastic changes to the CE approval process given that the accuracy of OBNM's reporting system is under question. Any proposed changes must be based on accurate data about which CE providers Oregon licensees are using and how much and should be done transparently. Please delay any discussion of such changes until any discrepancies can be clarified. Once clarified, the actual numbers should be made publicly available to licensees so they can be best informed over any proposed rule changes.

Thank you,
Dr. Crisp

CRUMPLER Robin * OBNM

From: Pamela Plank <dr.pamela.nd@gmail.com>
Sent: Monday, January 29, 2024 1:46 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed CE Changes

You don't often get email from dr.pamela.nd@gmail.com. Learn why this is important

- 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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.

--

Be kind, for everyone you meet is fighting a hard battle. --Ian MacLaren

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CRUMPLER Robin * OBNM

From: Pamela Plank <dr.pamela.nd@gmail.com>
Sent: Monday, January 29, 2024 1:47 PM
To: MEDICINE Naturopathic * OBNM
Subject: proposed CE changes

You don't often get email from dr.pamela.nd@gmail.com. Learn why this is important

I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.

Pamela Plank ND LAc
--
Be kind, for everyone you meet is fighting a hard battle. --Ian MacLaren

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CRUMPLER Robin * OBNM

From: Dr. Noël Thomas <info@drnoelthomas.com>
Sent: Monday, January 29, 2024 10:27 AM
To: MEDICINE Naturopathic * OBNM
Subject: CE Rule changes

You don't often get email from info@drnoelthomas.com. Learn why this is important

Dear OBNM board,

I am writing to provide my opinion as an ND that 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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.

Additionally, I disagree with making any drastic changes to the CE approval process given that the accuracy of OBNM's reporting system is under question. Any proposed changes must be based on accurate data about which CE providers Oregon licensees are using and how much and should be done transparently. Please delay any discussion of such changes until any discrepancies can be clarified. Once clarified, the actual numbers should be made publicly available to licensees so they can be best informed over any proposed rule changes.

Please note these considerations in any proposed rule changes.

Noël Thomas, ND
Holistic healthcare and neurofeedback
5200 S Macadam Ave Suite 160
Portland Oregon 97239

503-248-1182 office
503-214-8848 fax
www.drnoelthomas.com

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CRUMPLER Robin * OBNM

From: Dr WendyLeigh White <nd@drwendyleighwhite.com>
Sent: Monday, January 29, 2024 10:14 AM
To: MEDICINE Naturopathic * OBNM
Subject: CE options

You don't often get email from nd@drwendyleighwhite.com. Learn why this is important

Hello!

I want access to pre-approved CE intended for naturopathic doctors. I don't want to be primarily limited to OANP and NUNM offerings.

If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.

Thank you for reading.

In health,

Dr WendyLeigh White

Licensed Naturopathic Doctor, Visionary Craniosacral Practitioner | 503.956.9396 | Heart Spring Health | 819 SE Morrison St, Ste 115, Portland OR 97214 | www.heartspringhealth.com

Naturopathic consultant, nutritionist, educator | 503.433.5200 | www.drwendyleighwhite.com

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CRUMPLER Robin * OBNM

From: drchrisbooren <drchrisbooren@yahoo.com>
Sent: Wednesday, January 31, 2024 11:44 AM
To: MEDICINE Naturopathic * OBNM
Subject: Board changes

You don't often get email from drchrisbooren@yahoo.com. Learn why this is important

I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.
Dr. Chris Booren

CRUMPLER Robin * OBNM

From: Robin Tauzin ND <robitauzin@aol.com>
Sent: Wednesday, January 31, 2024 2:24 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE changes

You don't often get email from robitauzin@aol.com. Learn why this is important

Hi,

I live in another state and as I understand your CE changes, this will severely limit the CE offerings I will be able to obtain online. I usually get most of mine form Naturopathic CE and they are saying that these will no longer be accepted. I have a big problem with that. I urge you to make fair changes that keep those who do not live and practice in Oregon in mind. Thanks.

Robin Tauzin ND
Denver Vitalist Medicine
8600 Ralston Rd, Ste 206
Arvada, CO 80002

Office: 720-219-7147
Denvervitalistmedicine.com

CRUMPLER Robin * OBNM

From: christa barton <dr.christabarton@gmail.com>
Sent: Monday, February 5, 2024 9:59 AM
To: MEDICINE Naturopathic * OBNM
Subject: I disagree with making any drastic changes to the CE approval process

You don't often get email from dr.christabarton@gmail.com. Learn why this is important

To whom it may concern at the OBNM

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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.

Furthermore, I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.

Thank you,

Christa Barton, ND

Christa Barton, ND, LLC
Balanced and Bright Wellness
PO Box 42613
Portland, OR
97242
phone: 503-309-8855
fax: 844-308-5008
email: dr.christabarton@gmail.com
website: www.balancedbrightwellness.com

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CRUMPLER Robin * OBNM

From: Mark Bricca, ND, MAc <drmarkbricca@gmail.com>
Sent: Monday, February 5, 2024 10:37 AM
To: MEDICINE Naturopathic * OBNM
Subject: Comments on proposed CE rule changes

You don't often get email from drmarkbricca@gmail.com. Learn why this is important

Dear the Wonderful Staff at the OBNM:
First of all, I want to say that I hope you are all well. And, I want to acknowledge how grateful I am for all your hard work and dedication on behalf of me and my colleagues. I've been an Oregon ND licensee since 2008 and I have always appreciated all my interactions with members of the Board and found them to be helpful and supportive.

I have been reflecting on proposed changes to the CE approval process and I have some concerns. On the one hand, I certainly want to support the Board in stewarding its resources wisely and appropriately without undue burden. And, on the other hand, it is also vitally important to me to be able to access high quality CE, both in person and online, that meets the needs of my practice and is taught by integrative practitioners and other NDs.

Each of the recent several years, for example, I have attended Paul Anderson's AAMP conferences, either in-person or remotely. I have also joined a number of his monthly online educational webinars as well. With proposed rule changes, as I understand them, it will be more difficult and more costly for Dr. Anderson to get his educational offerings approved for CE. This, to me, would be very unfortunate and I cannot understand why the Board would want to take such an action--Dr. Anderson is a pillar of the ND community and his courses are beyond superb.

I cite Dr. Anderson as one example here. I also wonder about The Forum for Integrative Medicine, which I will attend in-person in Texas in a month. And the annual Oncology Association of Naturopathic Physicians conference, generally held annually in Arizona. It is not clear to me that these excellent conferences will be easy to obtain Oregon CE for under the proposed new rule structure.

As an ND and an Oregon licensee, given that CE is a requirement of annual licensure, I believe it is the Board's duty to ensure the most access possible to the highest quality, broadest range of CE offerings. This is really important to me as a clinician. CE is how I stay up-to-date and continue to learn about what's most cutting edge in practice. I need to be able to have access to the best CE possible in order to continue doing my best work on behalf of others.

Thank you for considering my comments and the comments of other stakeholders. I am truly grateful for all your efforts on our behalf, and I do not wish to overburden the OBNM staff or use its resources irresponsibly. As a clinician, I also need access to a broad range of highest quality CE and I am concerned that proposed rule changes will reduce what's available to me and/or make it more difficult to access.

With good wishes to each of you, and trust in the best outcome for everyone involved in this issue--sincerely,
Mark

Mark Bricca, ND, MAc

Bodhicitta Healing Arts

147 Gulf RD
Peterborough, NH 03458

(541) 201-2461 (p)

(866) 748-7842 (f)

www.bodhicittahealingarts.com

www.shafiyyinstitute.org

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Sunday, February 4, 2024 12:09 PM
To: Liz Dickey; MEDICINE Naturopathic * OBNM
Subject: RE: Comments on "Changes to Continuing Education Approval Process"
Attachments: DraftFiling 040-0230 - pdf.pdf

Thank you for your message.

This is exactly what the rules allow: CE approval for up to 32 hours for completed structured continuing education, including up to 10 hours of self-directed activities, I am in support of such revision

(1) Licensee attendees: **Licensees may apply for approval** of a completed structured continuing education program not accredited, provided, or approved per 850-040-0215 (i.e. not approved by an allowed accreditor), that meet the criteria set forth in 850-040-0230. [See below for activities for which approval may be requested. - L.D.]

Please see attached 040-0230 –Section 1(a)-(f). Licensees can apply for 32 hours of CE for a structured program (webinars, small group programs / etc) for all / any area of study required for renewal.

As part of the 32 hours - licensees can also apply for up to 10 hours for general education of self-directed activities listed in the rule (as you copied below). Please note we also added education opportunity not previously approved by rule.
(a) Structured business management and practice development programs

Thank you for your comment – your input is extremely helpful to the Board as they make these difficult decisions. Please let me know if you have any further questions.

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

From: Liz Dickey <ldickey@efn.org>
Sent: Sunday, February 4, 2024 10:07 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Comments on "Changes to Continuing Education Approval Process"

Dear Members of the Oregon Board of Naturopathic Medicine:

I respectfully request consideration of possible revision to the proposed rule change document 850.040.0230, to reflect the intent stated in this communication from the OBNM office:

> "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."

The proposed rule change does not seem to make this provision as clearly as might be possible. As written, "Adopt 50.040.0220" appears to indicate a licensee may obtain approval for only 10 hours of general education that is not 1) approved by an allowed accreditor or 2) provided by OANP or NUNM:

> (1) Licensee attendees: **Licensees may apply for approval** of a completed structured continuing education program not accredited, provided, or approved per 850-040-0215 (i.e. not approved by an allowed accreditor), that meet the criteria set forth in 850-040-0230. [See below for activities for which approval may be requested. - L.D.]

The document "Adopt 50.040.0220" states the following about obtaining approval for general education:

> (2) General Education Activity Approval: **Licensees may annually submit a total of ten (10) approved continuing education hours from a combination of the following activities:**
>
> (a) Structured business management and practice development programs
> (b) Peer reviewed publication, authorship, or review, maximum of three (3) total hours.
> (c) Formal protocol writing for a health care facility or government health care agency, maximum of three (3) total hours.
> (d) Naturopathic Physicians Licensing Examinations (NPLEX) Committee for the development and writing of the NPLEX examinations, maximum three (3) total hours.
> (e) Research related to the advancement of naturopathic medicine, for a recognized educational or medical institution or organization; maximum of six (6) total hours.
> (f) Presentation of a structured continuing education program in the scope of practice of naturopathic medicine in the State of Oregon; maximum of six (6) total hours.
> (g) Teaching an accredited graduate level course in the scope of practice of naturopathic medicine in the State of Oregon; maximum six (6) total hours.
> (h) Preceptorship with an Oregon licensed naturopathic physician or doctorate level clinician with a minimum of five (5) years of clinical experience, maximum six (6) total hours. Preceptorship must be in scope of practice of naturopathic medicine in the State of Oregon.

As someone who focuses on homeopathic medicine, I must rely on continuing education offered from professional-level educators not specified in the proposed rule. I would be unable to afford that education if I were also required to obtain approximately 20 hours from the specified sources.

If you believe it would be fitting to add clarifying language to specify the intent to allow licensee's to apply for CE approval for up to 32 hours for completed structured continuing education, including up to 10 hours of self-directed activities, I am in support of such revision.

Thank you very much for your consideration.

Sincerely,
Liz Dickey

CRUMPLER Robin * OBNM

From: Hilary F Stuart <hfstuart@comcast.net>
Sent: Tuesday, February 6, 2024 1:28 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE Approval and Board recommendations

You don't often get email from hfstuart@comcast.net. Learn why this is important

Members of the Boar

I believe there is a lot of misunderstanding and confusion about the changes proposed regarding CE requirements.

I specialize in a very unique niche that offers understanding of the spiritual, mental, emotional and energetic etiologies of chronic illness. I need to have access to more CE than just NUNM or OANP offers. I also feel that Naturopathic CE has been a useful platform for me to get pre-approved CE courses, especially in regards to required CE such as Pharmacy and Ethics. I want access to more pre-approved opportunities that are specifically intended for naturopathic doctors, not fewer. Please amend these changes so that there are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors. There are also courses I attend that have been approved by the APA (American Psychological Association) that I have had to ask for specific CE allowance from the Board. Please consider making anything approved by the APA available for pre-approved CE, similar to the CME that is already pre-approved for Medical Doctors.

Thank you,
Hilary
Hilary Farberow Stuart, N.D.
Naturopathic Physician
Wholehearted Healing, PC
www.wholeheartedhealing.org
hfstuart@comcast.net

CRUMPLER Robin * OBNM

From: Louise Tolzmann <louise@doclouise.com>
Sent: Tuesday, February 6, 2024 12:01 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE Changes

Hi there,

I am very concerned with the proposed changes to the CE approval process. As an ND with licenses in 2 states and having been in practice for over 25 years - the CE I look to get is more specialized. I do some online, but I frequently travel to get deeper knowledge. NUNM and many local Oregon CE courses do not serve my needs. I am very concerned that my education will be dumbed down if I am not able to continue to get high quality education from highly trained physicians - often in other states.

Thank you.

Louise

--
Louise Tolzmann, ND
4039 N. Mississippi Ave. #305
Portland OR 97227
p: (503) 477-7594
f: (503) 477-9437

www.doclouise.com

CRUMPLER Robin * OBNM

From: Megan Little <megan.claw@gmail.com>
Sent: Tuesday, February 6, 2024 12:21 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE Proposal Comments

Hello,

I am licensed as an ND in the state of Oregon, and practice and live in an unlicensed state (Missouri).

I have depended on the American Association of Naturopathic Physicians for many CE credits over the years, through their monthly free CE opportunities for members, as well as the annual conference, because I am in a n unregulated state, there are virtually no ND CE options where I live.

While I appreciate the changes you are looking to make regarding CE in Oregon to make it easier, I am disappointed by the lack of opportunities for Naturopathic Organizations, specifically the AANP. I would encourage the board to consider allowing the AANP as a pre-approved provider for CE in the state of Oregon for both the Annual Conference, as well as the monthly CE opportunities. The AANP has been providing CE for NDs for years. They are who I look to for up-to-date information in our profession. Limiting their approval would be a detriment to our providers.

Megan Little, ND
Lic 4045

CRUMPLER Robin * OBNM

From: Sarah Schumann-Curtis <wingedgiraffe@gmail.com>
Sent: Tuesday, February 6, 2024 11:35 AM
To: MEDICINE Naturopathic * OBNM
Subject: CEs

You don't often get email from wingedgiraffe@gmail.com. Learn why this is important

Hello,

Having access to a wider scope of approved CEs is important for a few reasons - variety of CEs, access to CEs and cost of CEs. It is already challenging being an ND, gaining CEs and further educating ourselves should not be an additional hardship.

Thank you for your time,

Sarah

CRUMPLER Robin * OBNM

From: ewsauter@gmail.com
Sent: Tuesday, February 6, 2024 4:32 PM
To: MEDICINE Naturopathic * OBNM
Subject: CME approval process

To Whom It May Concern:

I'm afraid I have to disagree with making any drastic changes to the CME approval process for naturopathic physicians, particularly those of us licensed in Oregon. It has become clear that the methods of OBNM's approval process are both unduly cumbersome and unfair.

Any proposed changes should, of course, be based on accurate data and must be done publicly and transparently. We certainly should not be limited to only a few options, as has been suggested. Physician-level CE opportunities approved by other professional medical associations, such as the American Medical Association (AMA), the American Association of Naturopathic Physicians (AANP), and many others, (including professional magazines approved for CME content by AMA, for example) should be allowed, without the need to be reviewed and "re-approved" every year.

The communication from OBNM **thus far** has been far from clear. If the Board is overworked, question why, and how to simplify it without unfairly limiting access to affordable CME for Oregon licensees.

Please delay the discussion of changes until these issues can be clarified. Once actual numbers are made publicly available to licensees, with ample opportunity for review, the best-informed choices can be made about any proposed rule changes.

Sincerely,

Ellen Sauter, ND
ewsauter@gmail.com

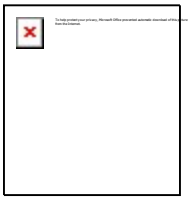
CRUMPLER Robin * OBNM

From: NAEM Executive Director <naturopathicenvironment@gmail.com>
Sent: Tuesday, February 6, 2024 12:03 PM
To: MEDICINE Naturopathic * OBNM
Subject: Oregon Board of Naturopathic Med. Proposed CE Changes

You don't often get email from naturopathicenvironment@gmail.com. Learn why this is important

As a smaller professional organization with many Naturopathic practitioners, including members in Oregon, we would like to support AANP's position on Oregon's proposed changes. Our concerns are that the proposed changes will limit the CE options available to our Oregon membership. It will also add a burden on our members to approve CE from AANP and other CE suppliers that will be excluded from your approved list. We ask you to reconsider the proposed changes.

Best regards,
Kathleen Mulligan
Executive Director
National Association of Environmental Medicine
www.envmedicine.com



CRUMPLER Robin * OBNM

From: Dr. Sara DeFrancesco <dr@drdefrancesco.com>
Sent: Tuesday, February 6, 2024 4:42 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed CE Changes

You don't often get email from dr@drdefrancesco.com. Learn why this is important

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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.

I don't support the proposed CE changes. They are restrictive and harsh. 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.

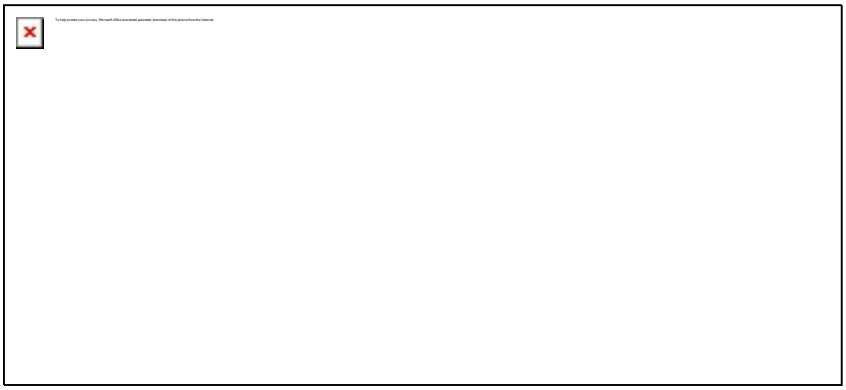
I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.

I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors.

I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.

I disagree with making any drastic changes to the CE approval process given that the accuracy of OBNM's reporting system is under question. Any proposed changes must be based on accurate data about which CE providers Oregon licensees are using and how much and should be done transparently. Please delay any discussion of such changes until any discrepancies can be clarified. Once clarified, the actual numbers should be made publicly available to licensees so they can be best informed over any proposed rule changes.

To Health With Heart,
Dr. Sara DeFrancesco



CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Tuesday, February 6, 2024 7:43 PM
To: smm16@bendbroadband.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: CE CHANGES

Thank you for your comment. I believe you received misinformation or misunderstood the rule changes. Please see below explanation of the rule changes.

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

1)The Board **added** four more approved providers to the rule, meaning licensees will have more options to take approved courses without having to fill out individual applications for approval. List of approved accreditors / programs:

(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)
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf

2)Licensees will continue to have the opportunity submit individual applications for CE approval – allowing licensees to take classes / webinars etc. that have not been approved by the Board for up to / all 32 hours of required education.
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

3)Licensees will still be able to apply for credit for self-directed activities. (teaching / making presentations / writing etc.)
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

4) 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, then the licensee participants may apply individually for credit for the program.
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

At the Feb 12 meeting the Board will discuss possible changes:

- Proposed draft states the course must be “in person” – public comment suggests / Board will consider approving in-state live programs with synchronous remote participants.
- Board will consider removing the 10 or more Oregon licensee attendance requirement.

5)Allows NUNM and OANP to apply for continuing education program approval.
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf

At the Feb 12 meeting the Board will discuss possible changes:

- The Board may consider allowing AANP to apply for approval for the AANP annual conference.

Please see the agenda for the public meeting on Monday, it also provides clarifications based on public comment, and some possible further changes.
https://www.oregon.gov/obnm/Documents/Board%20Information/Public%20Session%20Agenda%202024.02.pdf

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

From: Sheila Myers <smm16@bendbroadband.com>
Sent: Tuesday, February 6, 2024 4:00 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.Medicine@obnm.oregon.gov>
Subject: CE CHANGES

You don't often get email from smm16@bendbroadband.com. Learn why this is important

PLEASE STOP THE CE CHANGES

Your OBNM'S proposed CE changes will create GREAT HARDSHIPS for all of us NDs who do not reside in the Portland area.

These changes will cause a reduction in the number of licensed NDs in the State of Oregon. Thus limiting the number of qualified NDs available to the people of Oregon.

It appears to only be a money making scheme for OANP and NUNM, by only accepting OANP and NUNM live in-person approved CE.

If OBNM will only accept OANP and NUNM approved CE, then they need to offer live in-person courses through out the **WHOLE** State of Oregon.

From Ontario to Newport
From The Dallas to Klamath Falls
NDs do not only exist in Portland!!
As a ND that has served on the OBNM, I find the suggested changes **Horrifying!** Not once did any of us complain of being 'overworked'. Many of us serving had to travel 100+ miles and stay over night for the OBNM meetings.
By OBNM not accepting course credits from ACCME, ACPE, CNME, FNMRA, NANCEAC our commutations with other medical professionals in our communities will be severely effected.
PLEASE RECONSIDER THIS DISASTROUS CE PROPOSAL!!
Dr. Sheila M. Myers #0751
Bend, Oregon

nt from Mail for Windows

CRUMPLER Robin * OBNM

From: Laura Weldon <lzweldon@gmail.com>
Sent: Wednesday, February 7, 2024 1:26 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE

> You don't often get email from lzweldon@gmail.com. Learn why this is important

Hello,

I am an OANP and AANP member and rely on their conference for naturopathic CE. Please add AANP to the list of approved accredited services, providers, and agencies.

Thank you,

--
Laura Z. Weldon, ND, MS
Weldon Wellness, PLLC
Pronouns: she/they
weldonwellness.com

I respond to emails every 2-3 business days unless they are marked urgent (and I invite you to respond when it is best for you). Your patience is appreciated and reciprocated.

CRUMPLER Robin * OBNM

From: Marianne Marchese <marchesend@gmail.com>
Sent: Wednesday, February 7, 2024 12:15 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE

Hi

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

Attending our professions national conference is important and NOT getting CE in Oregon seems odd when every other licensed state recognizes AANP CE conference

Thanks so much for all you do at the board

Dr Marchese

CRUMPLER Robin * OBNM

From: Kristen Plunkett <dr.plunkett@yahoo.com>
Sent: Wednesday, February 7, 2024 12:20 PM
To: MEDICINE Naturopathic * OBNM
Subject: AANP CE

[You don't often get email from dr.plunkett@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Please add AANP onto the list of approved accreditation services, providers and agencies.

Thank you for all you do for us! You are greatly appreciated!

Kristen Plunkett, ND
OANP Secretary
Naturopathic Medical Clinic
1200 NE 7th St
Grants Pass, OR 97526

CRUMPLER Robin * OBNM

From: Mallory Rose <Mallory.Rose@nunm.edu>
Sent: Wednesday, February 7, 2024 12:01 PM
To: MEDICINE Naturopathic * OBNM
Subject: Approved accreditation services

You don't often get email from mallory.rose@nunm.edu. Learn why this is important

Hi,

I am a 5th year ND student and a member of AANP. I urge you to add AANP to the list of approved accreditation services, providers, and agencies.

Mallory

Mallory Rose
Naturopathic Medical Student 5/5
Rheumatology Club President
SGA Treasurer
She/her

P / 847-361-4927

National University of Natural Medicine
www.nunm.edu

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CRUMPLER Robin * OBNM

From: Abrianne <drwilesgoss@gmail.com>
Sent: Wednesday, February 7, 2024 1:53 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE approval changes

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

I use NaturopathicCE continuing ed courses and have found the content extremely valuablefor my practice and worthy of pre-approval. It is much easier for me to take classes that have been pre-approved as I am extremely busy running my practice and would rather spend time helping patients than work to gain approval for classes noteworthy of pre-approval.

Thanks,

Dr. Abrianne Goss
Sent from my iPhone

CRUMPLER Robin * OBNM

From: Ryan Heer <drryan@indnd.com>
Sent: Wednesday, February 7, 2024 1:29 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE change

You don't often get email from drryan@indnd.com. Learn why this is important

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

Ryan Heer, N.D.
Owner | Crossroads Integrative Medicine
Ph: 317-426-7557 | drryan@indnd.com
www.crossroadsintegrativemedicine.com

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CRUMPLER Robin * OBNM

From: Amy Bader <amy@amybadernd.com>
Sent: Wednesday, February 7, 2024 12:06 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE changes

You don't often get email from amy@amybadernd.com. Learn why this is important

To whom it may concern,

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

Thank you for your consideration,

Amy Bader, ND

CRUMPLER Robin * OBNM

From: elyse Herrick <drelyseherrick@gmail.com>
Sent: Wednesday, February 7, 2024 10:13 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE for Oregon Naturopaths

You don't often get email from drelyseherrick@gmail.com. Learn why this is important

I have been an Oregon ND for 40 years and am 75 years old. I still have an active license. I rely on websites such as Naturopathic CE, CNDA, and Institute of Brain Potential to get my continuing education. Their webinars are interesting and informative and easy to access. Please do not eliminate these and other valuable resources for continuing education. We need all the help we can get.
Thank you.
Sincerely,
Dr Linda Elyssia Herrick ND LAc

CRUMPLER Robin * OBNM

From: Wendy Vannoy <wendynd5@gmail.com>
Sent: Wednesday, February 7, 2024 11:51 AM
To: MEDICINE Naturopathic * OBNM
Subject: CE rule changes

You don't often get email from wendynd5@gmail.com. Learn why this is important

I am writing to say I am not in favor of the proposed CE rule changes.
I prefer to get my CE from a diverse selection of providers.
AANP and OANP are often the main source of my CE, however, there are MANY other offerings that help me receive/provide expanded education…
Including but not limited to:
Paul Anderson, ND
Community Compounding
NUNM
CEDH homeopathy (and other homeopathic educational providers)
Naturopathic CE
UCSF and other university offerings
WPATH for gender affirming health care
QUEERCE
https://www.cdc.gov/training/cecredit/types-of-ce.html
netce.com
nicabm.com
https://www.ohsu.edu/school-of-medicine/cpd/continuing-education-available-ohsu

Sincerely,
Wendy Vannoy, ND
#1374

CRUMPLER Robin * OBNM

From: Dr Haylee <me@drhaylee.com>
Sent: Wednesday, February 7, 2024 7:28 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE ruling

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

I'm an AANP member and Oregon licensee. Please add AANP to the list of approved accreditation services and agencies.

Thank you for your consideration

Dr. Haylee Nye - Sent from my iPhone

CRUMPLER Robin * OBNM

From: Suzanne Scopes <suzannescopes@gmail.com>
Sent: Wednesday, February 7, 2024 10:19 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE

I am very concerned that the proposed changes to the CE approval process will burden Oregon licensees by limiting CE opportunities. The CE courses offered by the AANP should be included in the pre-approved CE provider list. The AANP offers high quality, professional naturopathic education and has done so for many years. As a member of both AANP and OANP, I urge you to reconsider. It does not make sense to exclude them as pre-approved.
It will lower the burden on the OBNM and the Oregon licensees alike, to include the AANP CE offerings.
Thank you.

Suzanne Scopes ND
pronouns: she/her/hers
Circle Health Care, LLC
2326 NW Lovejoy St
Portland, OR 97210
503-230-0812 (office)
503-753-6533 (mobile for urgent issues, after hours)

CRUMPLER Robin * OBNM

From: Patricia Vasquez <drpatriciavasquez@gmail.com>
Sent: Wednesday, February 7, 2024 1:04 PM
To: MEDICINE Naturopathic * OBNM
Subject: Changes to CE rules

You don't often get email from drpatriciavasquez@gmail.com. Learn why this is important

Keep your message simple and focused:

I am Dr. Patricia Vasquez, an AANP member and my Oregon licensee is #4280, I heard the sad news of the changes regarding CE and I feel the urge for OBNM to add AANP to the list of Approved accreditation services, providers, and agencies.The reality it is that AANP has being a resource for my career but also to make CE simple, accessible and so practical to my overburdened schedule as a professional.

Thank you for your consideration

CRUMPLER Robin * OBNM

From: Dr. Elissa Mendenhall <docemendenhall@amenclinic.com>
Sent: Wednesday, February 7, 2024 12:14 PM
To: MEDICINE Naturopathic * OBNM
Subject: Changes to continuing education proposal

Hi, Team,

I wanted to write and express my concern about no longer allowing continuing education approved by Naturopathic CE or the AANP. I am unclear the benefit of this. Both organizations offer high-quality continuing education offerings, in my experience.

In Your Service,

Elissa C. Mendenhall, ND
Physician
P (650) 273-4245 | **O** 650-416-7830 ext. 1947
350 N. Wiget Lane, Suite 105 Walnut Creek, CA 94598
AmenClinics.com

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CRUMPLER Robin * OBNM

From: Kelly Owens <naturedr@comcast.net>
Sent: Wednesday, February 7, 2024 8:26 PM
To: MEDICINE Naturopathic * OBNM
Subject: comment on upcoming CE rule changes

You don't often get email from naturedr@comcast.net. Learn why this is important

Hi there. I am writing to submit a comment on the upcoming rule change proposed by OBNM regarding CE. As an AANP member and Oregon licensee I urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies." Their continuing education offerings are valuable additions to our collective knowledge and excluding the AANP from the list of approved accreditation provider/agencies will insert another obstacle into obtaining quality naturopathic focused continuing education.

Kelly Owens, ND
Tabor Village Wellness
404 SE 80th Avenue
Portland, OR 97215
phone
(503) 335-3201
fax
(503) 662-6212
www.taborvillagewellness.com

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CRUMPLER Robin * OBNM

From: Aimee Frieze <draimeefrieze@gmail.com>
Sent: Wednesday, February 7, 2024 5:59 AM
To: MEDICINE Naturopathic * OBNM
Subject: DISAGREE WITH CE PROPOSAL

You don't often get email from draimeefrieze@gmail.com. Learn why this is important

- 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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.

- I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.

-
- I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.

Dr Aimee Frieze
Oregon/Washington Licensed ND
4144
61184022

CRUMPLER Robin * OBNM

From: Jenna Halbert <drjennahalbert@gmail.com>
Sent: Wednesday, February 7, 2024 1:21 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: OBNM PROPOSED CONTINUING EDUCATION RULES: Clarifications and Projected/Positive Impact on Licensees. Public Comment Open to Feb 12

You don't often get email from drjennahalbert@gmail.com. Learn why this is important

Hello,
I'm responding to the proposed changes to CE rules, and I am not in support. I have read all documents as well as the clarification email and from my end it actually seems like it's going to be more difficult as a licensee to get CE credit for classes, and also will limit the options severely. For example, my practice is predominantly craniosacral therapy and homeopathy. Under the proposed rule changes, the classes I've currently been taking and plan to take in the future would not qualify for OBNM approval because they are not through NUNM or OBNM, and/or are not live in-state. For the craniosacral classes which would be live, the skillset provided is used by numerous different practitioners and the classes are small. So despite always having at least a couple NDs in the class, it would never reach the required 10 because the max class size is 8.

I can foresee this actually increasing the amount of work for OBNM because I, along with many of my colleagues, would just be submitting individual reviews for each of these classes that would soon not qualify for approval, despite being approved in the old system.

Because of these reasons, I emphatically implore you to reconsider these changes. The changes would essentially pigeon hole everyone into certain educational offerings, which would do a huge disservice to our entire profession. If the OBNM is feeling overwhelmed by the current system, let's come up with another option that would decrease your workload without essentially cutting off our CE offerings at the knees.

Thank you,
Dr. Jenna Halbert
license # 4360

On Wed, Jan 24, 2024 at 4:39 PM MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

> 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 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/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

--
Jenna Halbert, ND
Naturopathic Physician
she/her
drjennahalbert.com
Practicing at Portland Healing Space
Ph. 503-482-8301
1835 SE 50th Ave
Portland, OR 97215

CRUMPLER Robin * OBNM

From: Karen Cureton <drkarencureton@gmail.com>
Sent: Wednesday, February 7, 2024 10:59 AM
To: MEDICINE Naturopathic * OBNM
Subject: OPPOSING BOARD CHANGES TO CE APPROVAL

Dear Board Members,

I feel very strongly that the changes being proposed will be detrimental to both Oregon licensees and a number of our beloved CE providers other than NUNM and OANP. Please consider altering the proposed rule changes to be more fair and reasonable to all parties, not just beneficial for the board, NUNM, and 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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.
- I don't support the proposed CE changes. They are restrictive and harsh. 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.
- I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.
- I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.
- I disagree with making any drastic changes to the CE approval process given that the accuracy of OBNM's reporting system is under question. Any proposed changes must be based on accurate data about which CE providers Oregon licensees are using and how much and should be done transparently. Please delay any discussion of such changes until any discrepancies can be clarified. Once clarified, the actual numbers should be made publicly available to licensees so they can be best informed over any proposed rule changes.

Dr. Karen Cureton
Co-creator of the Wired for Wellness Program
Licensed Naturopathic Physician
Licensed Acupuncturist
Brain & Nervous System Retraining Coach

www.drkarencureton.com
www.getwiredforwellness.com

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CRUMPLER Robin * OBNM

From: Dr. Massey <drmassey@gmail.com>
Sent: Wednesday, February 7, 2024 4:11 PM
To: MEDICINE Naturopathic * OBNM
Subject: Planned new rule changes

Dear Board of OBNM,

Please amend your proposed new rules and include the AANP to the list of approved CE providers. We need easier and more lenient rules for accepting the continuing education programs that each Oregon Physician chooses to learn. there needs to be a greater latitude in seeking the credits doctors choose to take. OBNM needs to support and honor its licensed ND's and not restrict what they choose to learn in their CE selection. These new rules are not explained clearly so that doctors would understand why our state licensing organization, the OBNM, would choose to not allow CE from our main national Naturopathic association not be considered an approved provider for the CE they provide.

Yours in health,
Jim Massey ND

CRUMPLER Robin * OBNM

From: Eliot Edwards <dredwardsnd@gmail.com>
Sent: Wednesday, February 7, 2024 4:47 PM
To: MEDICINE Naturopathic * OBNM
Subject: Please add AANP to the list of Approved accreditation services, providers, and agencies.

You don't often get email from dredwardsnd@gmail.com. Learn why this is important

To whom it may concern:

I fully understand and support OBNM's changes to the CE approval process and appreciate the Department's goal of cost savings associated with this function.

However, I would urge OBNM to consider including the American Association of Naturopathic Physicians (AANP) on the list of approved accreditors. As the national association for the naturopathic medicine profession, the AANP has a vested interest in accrediting only the highest quality continuing education programs. Many Oregon ND Licensees attend the AANP Convention and their other CE programs as a large portion of their continuing education work each year.

Thank you for your consideration.

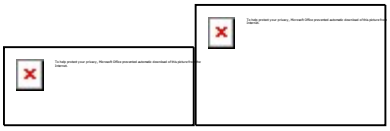
Sincerely,

Dr. Edwards

Eliot W. Edwards, ND, FABNO

NW Naturopathic Oncology/Sage Cancer Care
New Location!
9045 SW Barbur Blvd, Suite 106
Portland, OR 97219
503-206-6218
fax: 866-902-8622
www.northwestnaturopathiconcology.com

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CRUMPLER Robin * OBNM

From: Rachael O'Connell, ND <dr.oconnell@icloud.com>
Sent: Wednesday, February 7, 2024 6:31 PM
To: MEDICINE Naturopathic * OBNM
Subject: Please don't omit AANP from your approved education providers (public comment)

You don't often get email from dr.oconnell@icloud.com. Learn why this is important

Hi there,

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

I have gotten so much enrichment and value from attending this conference annually and there are many of us who rely on the AANP for our variety of CME credits.

It would add unnecessary competition and uncertainty to my CME planning and more administrative time to my already overburdened schedule if AANP isn't approved.

I am deeply concerned about these proposed changes and I implore you to reconsider.

There are no walls when you reach for the sky.

Rachael O'Connell, ND
thewarriordoc.com
clinic: nuturaclinic.com
artist site: linktr.ee/raddadlifestyle

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Thank you.

CRUMPLER Robin * OBNM

From: Greg Eckel <dreckel@naturecuresclinic.com>
Sent: Wednesday, February 7, 2024 1:19 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed CE changes will increase burden and hurt our profession

You don't often get email from dreckel@naturecuresclinic.com. Learn why this is important

Hello there to all Board members!

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. Eckel

Gregory Eckel, N.D., L.Ac.
Naturopathic Physician
Licensed Acupuncturist

"My purpose is to help as many people as I can achieve optimum health with an integrative patient centered care model."

CRUMPLER Robin * OBNM

From: rebecca.krisko@gmail.com
Sent: Wednesday, February 7, 2024 12:22 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed CE rules changes

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

Is it true that these would eliminate the AANP as a pre-approved entity?

What's the reasoning behind that?

I am an AANP member and Oregon licensee who gets a lot of their CE through the AANP offerings. I would advocate for adding the AANP to the list of approved accreditation services, providers, and agencies unless there is a clear and convincing argument to do otherwise.

Thanks for considering my thoughts and I'm hoping for a response so I can understand this decision better.

Rebecca Krisko

CRUMPLER Robin * OBNM

From: Hayleigh Ast <ast@ohsu.edu>
Sent: Wednesday, February 7, 2024 5:01 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed change to CMEs

You don't often get email from ast@ohsu.edu. Learn why this is important

Hello OBNM,

I'm sharing my concern as a member of the AANP and Oregon licensee at the proposed rule change. I urge OBNM to add AANP and Naturopathic CE to the list of "Approved accreditation services, providers, and agencies."

Thank you for your consideration of my comment.

Be Well,
Hayleigh K Ast, N.D.

T32 Post-Doctoral Researcher in ADHD youth | Center for Mental Health Innovation | SNACK Lab
Naturopathic Doctor | Neurotherapeutics Pediatric Therapies Inc.
ast@ohsu.edu | 610-334-8862

CRUMPLER Robin * OBNM

From: prapportnd@yahoo.com
Sent: Wednesday, February 7, 2024 12:05 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed changes to CE

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

Dear board members,

I want access to pre-approved CE intended for naturopathic physicians, and do not want to be primarily limited to OANP and NUNM programs. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees, like me, and allows us to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me, and diversity in thought and practice styles serves us, and our patients, which is what's important.

Please carefully consider the impact on our community of the changes that you're considering, and what is in our best interest.

Thank you.
Phyllis Rapport, ND

Sent from my iPad

CRUMPLER Robin * OBNM

From: Sheila Myers <smm16@bendbroadband.com>
Sent: Wednesday, February 7, 2024 2:01 PM
To: MEDICINE Naturopathic * OBNM
Subject: RE: CE CHANGES

You don't often get email from smm16@bendbroadband.com. Learn why this is important

Thank you for the clarification.
Dr. Sheila Myers

From: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Sent: Tuesday, February 6, 2024 7:43 PM
To: smm16@bendbroadband.com
Cc: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: FW: CE CHANGES

Thank you for your comment. I believe you received misinformation or misunderstood the rule changes. Please see below explanation of the rule changes.

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

1)The Board **added** four more approved providers to the rule, meaning licensees will have more options to take approved courses without having to fill out individual applications for approval. List of approved accreditors / programs:

(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)
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf

2)Licensees will continue to have the opportunity submit individual applications for CE approval – allowing licensees to take classes / webinars etc. that have not been approved by the Board for up to / all 32 hours of required education.
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

3)Licensees will still be able to apply for credit for self-directed activities. (teaching / making presentations / writing etc.)
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

4) 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, then the licensee participants may apply individually for credit for the program.

https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0220.pdf

At the Feb 12 meeting the Board will discuss possible changes:

- Proposed draft states the course must be "in person" – public comment suggests / Board will consider approving in-state live programs with synchronous remote participants.
- Board will consider removing the 10 or more Oregon licensee attendance requirement.

5)Allows NUNM and OANP to apply for continuing education program approval.
https://www.oregon.gov/obnm/Documents/Rules/Adopt%20850.040.0215.pdf

At the Feb 12 meeting the Board will discuss possible changes:

- The Board may consider allowing AANP to apply for approval for the AANP annual conference.

Please see the agenda for the public meeting on Monday, it also provides clarifications based on public comment, and some possible further changes.
https://www.oregon.gov/obnm/Documents/Board%20Information/Public%20Session%20Agenda%202024.02.pdf

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

From: Sheila Myers <smm16@bendbroadband.com>
Sent: Tuesday, February 6, 2024 4:00 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.Medicine@obnm.oregon.gov>
Subject: CE CHANGES

You don't often get email from smm16@bendbroadband.com. Learn why this is important

PLEASE STOP THE CE CHANGES

Your OBNM'S proposed CE changes will create GREAT HARDSHIPS for all of us NDs who do not reside in the Portland area.

These changes will cause a reduction in the number of licensed NDs in the State of Oregon. Thus limiting the number of qualified NDs available to the people of Oregon.
It appears to only be a money making scheme for OANP and NUNM, by only accepting OANP and NUNM live in-person approved CE.
If OBNM will only accept OANP and NUNM approved CE, then they need to offer live in-person courses through out the **WHOLE** State of Oregon.
From Ontario to Newport
From The Dallas to Klamath Falls
NDs do not only exist in Portland!!
As a ND that has served on the OBNM, I find the suggested changes **Horrifying!** Not once did any of us complain of being 'overworked'. Many of us serving had to travel 100+ miles and stay over night for the OBNM meetings.
By OBNM not accepting course credits from ACCME, ACPE, CNME, FNMRA, NANCEAC our commutations with other medical professionals in our communities will be severely effected.

PLEASE RECONSIDER THIS DISASTROUS CE PROPOSAL!!

Dr. Sheila M. Myers #0751
Bend, Oregon

nt from Mail for Windows

CRUMPLER Robin * OBNM

From: Dr. DeeAnn Saber <drdeeannnd@aol.com>
Sent: Wednesday, February 7, 2024 12:19 PM
To: MEDICINE Naturopathic * OBNM
Subject: Regarding new rules

You don't often get email from drdeeannnd@aol.com. Learn why this is important

To the OBNM group,

As a longtime member of the AANP and a working physician for 15 years now, I appreciate having our national association offerings of qualified CE courses. I always enjoy going to the AANP annual conference and learning more about Naturopathic medicine. This is how we stay up on what's new, what is important and handle all our annual CE requirements.

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.**

Why you are doing this is beyond me, but I think and understand as a practicing physician that having the AANP resources to use and work with is very valuable and should be continued to be accessible to all our colleagues including the ones in Oregon.

Thank you, Dr. Saber

Dr. DeeAnn G. Saber, NMD
Transformational Medicine
2028 East Prince Road
Tucson, AZ 85719
Office# 520-209-1755
Fax: 520-798-2468
DeeAnn@TFMND.com
Home - Transformational Medicine (tfmnd.com)

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CRUMPLER Robin * OBNM

From: Jennifer Strider <jennifer@simplefamilyhealth.com>
Sent: Thursday, February 8, 2024 8:02 AM
To: MEDICINE Naturopathic * OBNM
Subject: AANP

Dear OBNM decision makers,

The AANP is our national organization. I am an AANP member and an Oregon license holder. I urge you to make the lives of Naturopathic Doctors easier not harder. We are already struggling against insurance companies for pay parity. Let us not have to struggle to maintain our licensure. I encourage you to add AANP to the list of approved accreditation services, providers and agencies.

Sincerely,
Dr Jennifer Strider ND

Sent from my iPhone

CRUMPLER Robin * OBNM

From: Dr Amandalynn Hoffman <dramandalynn@gmail.com>
Sent: Thursday, February 8, 2024 11:27 AM
To: MEDICINE Naturopathic * OBNM; OBNM.Info@state.or.us
Subject: add AANP and Naturopathic CE

Hello Board members

I would love to share my thoughts as I'm passionate about this...We need to have the options for our continuing education. Individual care and a variety of education is our right please see the Naturopathic CE's suggestions to help us all win!

I hope to do a CEU to my colleagues on Marfan syndrome and that could be an life saving class to many patient's if more drs are aware of their options to support us Marfs. I will not be able to properly share this information as many of us drs are too busy and $ strapped to pay for this education just because! THe ceu's allow us to gain education and support from each other! THis will tear down even our own comradery!

Please don't allow this just get tech support on your drop downs or stop auditing everyone and go back to the lottery on audits!

Appreciate you reviewing,

Amanda Hoffman licensed Oregon Dr #1685

Dr. Amanda Lynn Hoffman Naturopathic Physician
Calypso Natural Clinic
PO Box 185 Amity OR 97101
P(503)472-5500 F(503)434-1224
CalypsoNaturalClinic.com

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:51 PM
To: prapportnd@yahoo.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Proposed changes to CE

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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

-----Original Message-----
From: prapportnd@yahoo.com <prapportnd@yahoo.com>
Sent: Wednesday, February 7, 2024 12:05 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.Medicine@obnm.oregon.gov>
Subject: Proposed changes to CE

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

Dear board members,

I want access to pre-approved CE intended for naturopathic physicians, and do not want to be primarily limited to OANP and NUNM programs. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees, like me, and allows us to still learn from naturopathic doctors on the topics that

are important to me. Learning from my colleagues in the field is important to me, and diversity in thought and practice styles serves us, and our patients, which is what's important.

Please carefully consider the impact on our community of the changes that you're considering, and what is in our best interest.

Thank you.
Phyllis Rapport, ND

Sent from my iPad

CRUMPLER Robin * OBNM

From: Jennifer Brennan-Kos <jenniferbk@gmail.com>
Sent: Thursday, February 8, 2024 10:35 AM
To: MEDICINE Naturopathic * OBNM
Subject: Keep AANP CE

You don't often get email from jenniferbk@gmail.com. Learn why this is important

1. To whom it may concern, I am an Oregon licensee, and urge OBNM to add AANP to the list of “Approved accreditation services, providers, and agencies”. Please don’t make obstacles to accessing AANP’s wide range of high quality continuing education programs that truly represents the scope of the ND license.

Thank you for your time and consideration.

Jennifer Brennan-Kos, ND

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:31 PM
To: dr.oconnell@icloud.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Please don't omit AANP from your approved education providers (public comment)

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Executive Director - Oregon Board of Naturopathic Medicine
800 NE Oregon Street, Suite 407
Portland OR 97232
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From: Rachael O'Connell, ND <dr.oconnell@icloud.com>
Sent: Wednesday, February 7, 2024 6:31 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Please don't omit AANP from your approved education providers (public comment)

> You don't often get email from dr.oconnell@icloud.com. Learn why this is important

Hi there,

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I am deeply concerned about these proposed changes and I implore you to reconsider.

There are no walls when you reach for the sky.

Rachael O'Connell, ND
thewarriordoc.com
clinic: nuturaclinic.com
artist site: linktr.ee/raddadlifestyle

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Thank you.

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:04 PM
To: MEDICINE Naturopathic * OBNM; drashliehempstead@gmail.com
Subject: RE: Proposed CE changes

Thank you for your message. Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

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Executive Director - Oregon Board of Naturopathic Medicine
800 NE Oregon Street, Suite 407
Portland OR 97232
971/673-0193 MESSAGE ONLY

From: Ashlie Hempstead <drashliehempstead@gmail.com>
Sent: Thursday, February 8, 2024 2:57 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Proposed CE changes

You don't often get email from drashliehempstead@gmail.com. Learn why this is important

- I don't support the proposed CE changes. They are restrictive and harsh. I urge the board to consider the importance of online CE opportunities, especially for specialized categories which pose the strictest requirements for Oregon licensees.

Dr. Ashlie Hempstead
Pronouns: She/Her/They
Naturopathic Doctor and Acupuncturist

Arc&Coil Slow Medicine
https://www.arcandcoil.com/

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 6:06 PM
To: rebecca.krisko@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Proposed CE rules changes

Thank you for your comments.

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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

-----Original Message-----
From: rebecca.krisko@gmail.com <rebecca.krisko@gmail.com>
Sent: Wednesday, February 7, 2024 12:22 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Proposed CE rules changes

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I am an AANP member and Oregon licensee who gets a lot of their CE through the AANP offerings. I would advocate for adding the AANP to the list of approved accreditation services, providers, and agencies unless there is a clear and convincing argument to do otherwise.

Thanks for considering my thoughts and I'm hoping for a response so I can understand this decision better.

Rebecca Krisko

CRUMPLER Robin * OBNM

From: Dr. Lisa Fortes-Schramm, ND <roamingnd@gmail.com>
Sent: Thursday, February 8, 2024 8:37 AM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed change to CE rules

To the OBNM Board,

I recently moved back to Portland, OR. I am an AANP member and am in process to obtain my Oregon licensee. I already hold a CA license and have a thriving practice in the Bay Area. I urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies." Not doing so is definitely a deterrent to holding an OR license and joining the OANP. It's bad enough that there is so little cross-collaboration of CE between CA and OR.

I appreciate your thoughtful consideration,

Dr. Fortes
---_----------

Dr. Lisa Fortes-Schramm, ND, DTCM
Tel. 408-357-3422
Fax. 408-693-3840
sanjoseintegrativemedicine.com

San Jose Integrative Medicine
3535 Ross Ave, Ste 101
San Jose, CA 95124

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:56 PM
To: marchesend@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: CE

Thank you for your public comment.

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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

From: Marianne Marchese <marchesend@gmail.com>
Sent: Wednesday, February 7, 2024 12:15 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.Medicine@obnm.oregon.gov>
Subject: CE

Hi

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

Attending our professions national conference is important and NOT getting CE in Oregon seems odd when every other licensed state recognizes AANP CE conference

Thanks so much for all you do at the board

Dr Marchese

CRUMPLER Robin * OBNM

From: Dr. Della Parker <drdellaparker@gmail.com>
Sent: Thursday, February 8, 2024 2:29 PM
To: MEDICINE Naturopathic * OBNM
Subject: Rule change

You don't often get email from drdellaparker@gmail.com. Learn why this is important

I am urging you NOT to make this rule change. It is already hard enough to find CE approved classes that appeal to my interests. By taking these pre approved classes away you are making it much more difficult to meet requirements and submit for renewal. The process is hard enough without having to submit for approval on every class I attend. Please work to make the renewal process EASIER and not more difficult on busy practitioners.
Thank you!

Dr. Della Parker, ND
Stellar Health and Wellness
10151 SE Sunnyside Rd.
Suite 320
Clackamas, OR 97015
P (503) 344-6631 F (503) 850-4963
www.StellarHW.com

Check out our FREE Mom On The Go Paleo Meal Plan!

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CRUMPLER Robin * OBNM

From: Dr. Daniel Smith <drdan@bearcreekclinic.com>
Sent: Thursday, February 8, 2024 12:56 PM
To: MEDICINE Naturopathic * OBNM

You don't often get email from drdan@bearcreekclinic.com. Learn why this is important

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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.

I don't support the proposed CE changes. They are restrictive and harsh. 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.

I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.

I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.

I disagree with making any drastic changes to the CE approval process given that the accuracy of OBNM's reporting system is under question. Any proposed changes must be based on accurate data about which CE providers Oregon licensees are using and how much and should be done transparently. Please delay any discussion of such changes until any discrepancies can be clarified. Once clarified, the actual numbers should be made publicly available to licensees so they can be best informed over any proposed rule changes

Dr. Daniel Smith #1322

Dr. Daniel Smith
Bear Creek Naturopathic Clinic
2612 E. Barnett Rd.
Medford, OR 97504
(541) 770-5563
email correspondence: Please use drdanielnd@gmail.com

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CRUMPLER Robin * OBNM

From: Sam Merz <drsammerz@gmail.com>
Sent: Thursday, February 8, 2024 10:40 AM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed CE Changes

> You don't often get email from drsammerz@gmail.com. Learn why this is important

Good morning,

These proposed changes would greatly impact my ability to get my required CE. I am a member of AANP and would urge you to add AANP to the list of approved agencies.

Samantha Merz, ND
Naturopathic Physician
Deep Roots Family Medicine
(503) 477-1889

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 6:03 PM
To: MEDICINE Naturopathic * OBNM; dr.plunkett@yahoo.com
Subject: RE: AANP CE

Thank you for your kind response.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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

-----Original Message-----
From: Kristen Plunkett <dr.plunkett@yahoo.com>
Sent: Wednesday, February 7, 2024 12:20 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: AANP CE

[You don't often get email from dr.plunkett@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Please add AANP onto the list of approved accreditation services, providers and agencies.

Thank you for all you do for us! You are greatly appreciated!

Kristen Plunkett, ND
OANP Secretary
Naturopathic Medical Clinic

1200 NE 7th St
Grants Pass, OR 97526

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:39 PM
To: Jennifer Strider
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: AANP

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

-----Original Message-----
From: Jennifer Strider <jennifer@simplefamilyhealth.com>
Sent: Thursday, February 8, 2024 8:02 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: AANP

Dear OBNM decision makers,

The AANP is our national organization. I am an AANP member and an Oregon license holder. I urge you to make the lives of Naturopathic Doctors easier not harder. We are already struggling against insurance companies for pay parity. Let us not have to struggle to maintain our licensure. I encourage you to add AANP to the list of approved accreditation services, providers and agencies.

Sincerely,
Dr Jennifer Strider ND

Sent from my iPhone

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:17 PM
To: dramandalynn@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: add AANP and Naturopathic CE

Thank you for your message. Please know that the Board and I value the work and comradery that comes from Oregon licensees providing courses with and for their colleagues. Good news – you still will be able to apply for CE approval from the Board.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Dr Amandalynn Hoffman <dramandalynn@gmail.com>
Sent: Thursday, February 8, 2024 11:27 AM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>; OBNM.Info@state.or.us
Subject: add AANP and Naturopathic CE

Hello Board members

I would love to share my thoughts as I'm passionate about this...We need to have the options for our continuing education. Individual care and a variety of education is our right please see the Naturopathic CE's suggestions to help us all win!

I hope to do a CEU to my colleagues on Marfan syndrome and that could be an life saving class to many patient's if more drs are aware of their options to support us Marfs. I will not be able to properly share this information as many of us drs are too busy and $ strapped to pay for this education just because! THe ceu's allow us to gain education and support from each other! THis will tear down even our own comradery!

Please don't allow this just get tech support on your drop downs or stop auditing everyone and go back to the lottery on audits!

Appreciate you reviewing,

Amanda Hoffman licensed Oregon Dr #1685

Dr. Amanda Lynn Hoffman Naturopathic Physician
Calypso Natural Clinic
PO Box 185 Amity OR 97101
P(503)472-5500 F(503)434-1224
CalypsoNaturalClinic.com

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:50 PM
To: Mallory.Rose@nunm.edu
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Approved accreditation services

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Mallory Rose <Mallory.Rose@nunm.edu>
Sent: Wednesday, February 7, 2024 12:01 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Approved accreditation services

> You don't often get email from mallory.rose@nunm.edu. Learn why this is important

Hi,

I am a 5th year ND student and a member of AANP. I urge you to add AANP to the list of approved accreditation services, providers, and agencies.

Mallory

Mallory Rose
Naturopathic Medical Student 5/5
Rheumatology Club President
SGA Treasurer
She/her

P / 847-361-4927

National University of Natural Medicine
www.nunm.edu

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:07 PM
To: MEDICINE Naturopathic * OBNM; deborah.frances@yahoo.com
Subject: RE: CE changes comment

Thank you for your message. Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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

From: Deborah Frances <deborah.frances@yahoo.com>
Sent: Thursday, February 8, 2024 1:22 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: CE changes comment

You don't often get email from deborah.frances@yahoo.com. Learn why this is important

There should be no reason why AANP approved CEs, shouldn't automatically be accepted by the Oregon board. Please don't change this.

Deborah Frances, Oregon License 0792

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:53 PM
To: amy@amybadernd.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: CE changes

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Amy Bader <amy@amybadernd.com>
Sent: Wednesday, February 7, 2024 12:06 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: CE changes

> You don't often get email from amy@amybadernd.com. Learn why this is important

To whom it may concern,

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

Thank you for your consideration,

Amy Bader, ND

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:41 PM
To: drelyseherrick@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: CE for Oregon Naturopaths

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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

From: elyse Herrick <drelyseherrick@gmail.com>
Sent: Wednesday, February 7, 2024 10:13 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: CE for Oregon Naturopaths

You don't often get email from drelyseherrick@gmail.com. Learn why this is important

I have been an Oregon ND for 40 years and am 75 years old. I still have an active license. I rely on websites such as Naturopathic CE, CNDA, and Institute of Brain Potential to get my continuing education. Their webinars are interesting and informative and easy to access. Please do not eliminate these and other valuable resources for continuing education. We need all the help we can get.
Thank you.
Sincerely,
Dr Linda Elyssia Herrick ND LAc

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:48 PM
To: wendynd5@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: CE rule changes

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Wendy Vannoy <wendynd5@gmail.com>
Sent: Wednesday, February 7, 2024 11:51 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: CE rule changes

You don't often get email from wendynd5@gmail.com. Learn why this is important

I am writing to say I am not in favor of the proposed CE rule changes.
I prefer to get my CE from a diverse selection of providers.
AANP and OANP are often the main source of my CE, however, there are MANY other offerings that help me receive/provide expanded education…
Including but not limited to:
Paul Anderson, ND
Community Compounding
NUNM
CEDH homeopathy (and other homeopathic educational providers)
Naturopathic CE

UCSF and other university offerings
WPATH for gender affirming health care
QUEERCE
https://www.cdc.gov/training/cecredit/types-of-ce.html
netce.com
nicabm.com
https://www.ohsu.edu/school-of-medicine/cpd/continuing-education-available-ohsu

Sincerely,
Wendy Vannoy, ND
#1374

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 2:48 PM
To: MEDICINE Naturopathic * OBNM; molliewalker@gmail.com
Subject: RE: CE rule proposal

Thank you for your message. I sent a message this afternoon correcting and clarifying the message sent yesterday by AANP. Please see the Board website for a response to your comment below along with other important information(link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Mollie Walker <molliewalker@gmail.com>
Sent: Thursday, February 8, 2024 2:40 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: CE rule proposal

> You don't often get email from molliewalker@gmail.com. Learn why this is important

Hello there,

I hold a naturopathic medical license in Oregon and I want to urge you to add AANP to the list of approved accreditation services, providers and agencies. Not doing so would cause an increased burden and complexity to practitioners getting our CEs every year when we already have busy enough schedules as it is. Reducing access to naturopathic specific CEs also has the potential to harm our profession's proficiency.

Thanks for your time,
Dr. Mollie Walker, ND

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:28 PM
To: me@drhaylee.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: CE ruling

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

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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

-----Original Message-----
From: Dr Haylee <me@drhaylee.com>
Sent: Wednesday, February 7, 2024 7:28 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: CE ruling

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

I'm an AANP member and Oregon licensee. Please add AANP to the list of approved accreditation services and agencies.

Thank you for your consideration

Dr. Haylee Nye - Sent from my iPhone

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:40 PM
To: suzannescopes@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: CE

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

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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

From: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Sent: Thursday, February 8, 2024 11:49 AM
To: BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov>
Subject: FW: CE

From: Suzanne Scopes <suzannescopes@gmail.com>
Sent: Wednesday, February 7, 2024 10:19 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: CE

I am very concerned that the proposed changes to the CE approval process will burden Oregon licensees by limiting CE opportunities. The CE courses offered by the AANP should be included in the pre-approved CE provider list. The AANP

offers high quality, professional naturopathic education and has done so for many years. As a member of both AANP and OANP, I urge you to reconsider. It does not make sense to exclude them as pre-approved.
It will lower the burden on the OBNM and the Oregon licensees alike, to include the AANP CE offerings.
Thank you.

Suzanne Scopes ND
pronouns: she/her/hers
Circle Health Care, LLC
2326 NW Lovejoy St
Portland, OR 97210
503-230-0812 (office)
503-753-6533 (mobile for urgent issues, after hours)

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:40 PM
To: drpatriciavasquez@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Changes to CE rules

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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

From: Patricia Vasquez <drpatriciavasquez@gmail.com>
Sent: Wednesday, February 7, 2024 1:04 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Changes to CE rules

> You don't often get email from drpatriciavasquez@gmail.com. Learn why this is important

Keep your message simple and focused:

I am Dr. Patricia Vasquez, an AANP member and my Oregon licensee is #4280, I heard the sad news of the changes regarding CE and I feel the urge for OBNM to add AANP to the list of Approved accreditation services, providers, and agencies.The reality it is that AANP has being a resource for my career but also to make CE simple, accessible and so practical to my overburdened schedule as a professional.

Thank you for your consideration

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:54 PM
To: docemendenhall@amenclinic.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Changes to continuing education proposal

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Dr. Elissa Mendenhall <docemendenhall@amenclinic.com>
Sent: Wednesday, February 7, 2024 12:14 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Changes to continuing education proposal

Hi, Team,

I wanted to write and express my concern about no longer allowing continuing education approved by Naturopathic CE or the AANP. I am unclear the benefit of this. Both organizations offer high-quality continuing education offerings, in my experience.

In Your Service,

Elissa C. Mendenhall, ND

Physician
P (650) 273-4245 | **O** 650-416-7830 ext. 1947
350 N. Wiget Lane, Suite 105 Walnut Creek, CA 94598

AmenClinics.com

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CRUMPLER Robin * OBNM

From: Karen DeWitt <karendnd@gmail.com>
Sent: Thursday, February 8, 2024 6:57 PM
To: MEDICINE Naturopathic * OBNM
Subject: CME changes

I highly recommend OBNM add the AANP and the AMA (American Medical Association) to it's list of approved accreditation providers.

This would significantly increase the amount of high quality continuing education available for NDs in Oregon.

--
Warmly,

Karen DeWitt ND
Portland, Oregon

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:25 PM
To: naturedr@comcast.net
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: comment on upcoming CE rule changes

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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

From: Kelly Owens <naturedr@comcast.net>
Sent: Wednesday, February 7, 2024 8:26 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: comment on upcoming CE rule changes

You don't often get email from naturedr@comcast.net. Learn why this is important

Hi there. I am writing to submit a comment on the upcoming rule change proposed by OBNM regarding CE. As an AANP member and Oregon licensee I urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies." Their continuing education offerings are valuable additions to our collective knowledge and excluding the AANP from the list of approved accreditation provider/agencies will insert another obstacle into obtaining quality naturopathic focused continuing education.

Kelly Owens, ND

Tabor Village Wellness
404 SE 80th Avenue
Portland, OR 97215
phone
(503) 335-3201
fax
(503) 662-6212
www.taborvillagewellness.com

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:30 PM
To: jenniferbk@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Keep AANP CE

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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

From: Jennifer Brennan-Kos <jenniferbk@gmail.com>
Sent: Thursday, February 8, 2024 10:35 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Keep AANP CE

You don't often get email from jenniferbk@gmail.com. Learn why this is important

1. To whom it may concern, I am an Oregon licensee, and urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies". Please don't make obstacles to accessing AANP's wide range of high quality continuing education programs that truly represents the scope of the ND license.

Thank you for your time and consideration.

CRUMPLER Robin * OBNM

From: Angie Elliot <angieelliotnd@gmail.com>
Sent: Thursday, February 8, 2024 4:33 PM
To: MEDICINE Naturopathic * OBNM
Subject: OBNM CE rules

You don't often get email from angieelliotnd@gmail.com. Learn why this is important

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."
Thanks for your consideration.
Sincerely,
Angie Elluit

Angie Elliot, ND, LAc
Northwest Health Specialties
p: 360-519-7631
www.nwhswa.com
16703 SE McGillivray Blvd # 175, Vancouver WA 98683

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:11 PM
To: Dr. Daniel Smith
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: OBNM clarifications / corrections

Thank you for your message. Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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

From: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Sent: Thursday, February 8, 2024 12:57 PM
To: BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov>
Subject: FW:

From: Dr. Daniel Smith <drdan@bearcreekclinic.com>
Sent: Thursday, February 8, 2024 12:56 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject:

You don't often get email from drdan@bearcreekclinic.com. Learn why this is important

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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.

I don't support the proposed CE changes. They are restrictive and harsh. 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.

I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.

I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.

I disagree with making any drastic changes to the CE approval process given that the accuracy of OBNM's reporting system is under question. Any proposed changes must be based on accurate data about which CE providers Oregon licensees are using and how much and should be done transparently. Please delay any discussion of such changes until any discrepancies can be clarified. Once clarified, the actual numbers should be made publicly available to licensees so they can be best informed over any proposed rule changes

Dr. Daniel Smith #1322

Dr. Daniel Smith
Bear Creek Naturopathic Clinic
2612 E. Barnett Rd.
Medford, OR 97504
(541) 770-5563
email correspondence: Please use drdanielnd@gmail.com

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CRUMPLER Robin * OBNM

From: Dr. Orna Izakson <dro@celilohealth.com>
Sent: Thursday, February 8, 2024 1:15 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: OBNM CORRECTIONS AND CLARIFICATIONS to AANP message to Oregon Licensees: Changes to CE Rules Will Impact You. Deadline to comment 2/12.

Importance: High

You don't often get email from dro@celilohealth.com. Learn why this is important

Thank you for sending this out. It clarified some things, but not the key questions.

For instance, the end of section 4/3 (dual numbering systems, so confusing.)

- 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.*

These three things seem mutually exclusive. Are these items up for consideration, one of which will be the final rule? The problem from the perspective of any CE provider who isn't in the preapproved list is that you can't necessarily get 10 Oregon licensees to register for a CE event that can't for sure offer OBNM CE. You're basically telling CE providers like AANP that they can't advertise CE for an event to Oregon licensees until they meet a criterion that impairs their ability to sell the event to Oregon licensees. That just doesn't make sense.

Another question related to this section: What about prerecorded events that would otherwise meet the criteria? Will OBNM no longer pre approve those? Is that going to require as separate approval process? Or will that only be available through NANCEAC, etc.?

The second bullet point under item 1 is disingenuous. Yes, OANP and AANP offer events that cannot be approved for CE. In Oregon, OANP wouldn't even apply for those because obviously. But AANP, offering its own accreditation, follows the same rules and does not offer CE for business development, billing practicers, etc. Because no one considers those to be CE. Further, even if they did offer CE for it, OBNM rules clearly state that those topics don't count for CE. So if I as a licensee tried to submit that, presumably OBNM would kick it back to me as inadequate for state licensing requirements.

Many of us rely on AANP webinars instead of or in addition to the annual conference for some of our CE. Requiring us to individually submit applications for each such webinar is onerous and unnecessary.

Thank you for your consideration of these comments. I know you're trying to navigate something contentious and difficult. We all want things to work out in the best possible way for everyone.

—Dr. Orna Izakson, OR licence 1686

Orna Izakson, ND, RH (AHG)
Celilo Natural Health Center, LLC
4921 NE 28th Ave.
Portland, OR 97211
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503.335.9479

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On Feb 8, 2024, at 12:45 PM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

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 programing 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;

1) *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) 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

- 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

2) *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 partieshttps://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…

3)

- 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.*

4)

5) *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) *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
300 New Jersey Ave NW, STE 900, Washington, DC 20001

Unsubscribe 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;

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: BAPTISTA Mary Beth * OBNM
Sent: Thursday, February 8, 2024 2:40 PM
To: MEDICINE Naturopathic * OBNM; Julie Glass
Subject: RE: OBNM PROPOSED CONTINUING EDUCATION RULES: Clarifications and Projected/Positive Impact on Licensees. Public Comment Open to Feb 12

Thank you for your kind words and helpful response. The Board is considering allowing AANP to apply for Board approval of the annual conference.

I have a question for you re: continuing education weekend in IV oncology hosted by the International IV Nutritional Therapy group, and I recently committed to a yearlong program of Integrative Oncology given by Dr. Nasha Winters and the Metabolic Terrain Institute of Health.

Was the weekend oncology course in Oregon? In person? Live or webinar? And the year long program, is that on-line? Are the on-line courses live or webinar based? If you have a moment to let me know it would be very helpful.

Thank you

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

From: Julie Glass <drjulieg@me.com>
Sent: Thursday, February 8, 2024 1:42 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: Re: OBNM PROPOSED CONTINUING EDUCATION RULES: Clarifications and Projected/Positive Impact on Licensees. Public Comment Open to Feb 12

> You don't often get email from drjulieg@me.com. Learn why this is important

Hello,

Thank you to the OBNM Board members for your hard work and dedication to Oregon ND's. I have just read your email of 2/8/24 and would like to propose that the OBNM Board consider pre-approving specific AANP continuing education courses that are not proprietary in nature or focused on business growth and development, medical or insurance billing practices, and non professional programs directed to the general public. I understand this might involve requesting that the AANP create two categories of continuing education courses - one that meets OBNM criteria for continuing

education and one that does not - but I believe this would be possible since the two organizations already partner in multiple ways.

I believe a continuing education partnership between OBNM and AANP would be beneficial to all parties in a multitude of ways, including:

*lessening OBNM's workload of approving contenting education courses
*strengthening the existing partnership between AANP and OBNM
*lessening the strain continuing education providers have in obtaining pre-approval for their courses
*assuring more variety in continuing education

I have used a variety of continuing education providers and appreciate the privileges I have as an Oregon provider. This year I have already completed a continuing education weekend in IV oncology hosted by the International IV Nutritional Therapy group, and I recently committed to a year long program of Integrative Oncology given by Dr. Nasha Winters and the Metabolic Terrain Institute of Health. Both of these organizations were started by leaders in our profession (Dr. Paul Anderson and Dr. Nasha Winters, respectively), and both courses/programs have been approved by the AANP for continuing education. I have literally and without regret spent thousands of dollars on these courses, and I would value and appreciate that the AANP approval assured that I receive my hard earned credits.

Thank you for hearing me, and your dedication and time to this issue. One last thought is that this depending of reciprocity between the OBNM and AANP would create alignment, and thus contribute to the strengthening of the naturopathic profession in this country.

Sincerely,
Dr. Julie Glass, ND
Health from the Heart
www.healthfromtheheart.club
Podcast: Reasonable
PH: 971-283-7100
FAX: 888-849-3103

HEALTH *from the* HEART

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

Please send an email to this address with your comment and we will share it with the Board.
https://www.oregon.gov/obnm/Pages/Notice-of-Proposed-Rules-for-Public-Comment.aspx
The Board will also hear public comments at the bi-monthly public meeting on Feb. 12 – starting at approximately 1pm. The website link will be updated on Monday with the agenda and with in-person and call in instructions.
https://www.oregon.gov/obnm/Pages/Board-Meetings.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

From: Julie Glass <drjulieg@me.com>
Sent: Saturday, February 3, 2024 2:48 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: Re: OBNM PROPOSED CONTINUING EDUCATION RULES: Clarifications and Projected/Positive Impact on Licensees. Public Comment Open to Feb 12

You don't often get email from drjulieg@me.com. Learn why this is important

Hello,

How do I submit a public comment for these proposed rule changes?

Thank you,
Dr. Julie Glass, ND
Health from the Heart
www.healthfromtheheart.club
Podcast: Reasonable
PH: 971-283-7100
FAX: 888-849-3103

<image001.jpg>

> On Jan 24, 2024, at 4:31 PM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:
>
> 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 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/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: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 5:46 PM
To: drkarencureton@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: OPPOSING BOARD CHANGES TO CE APPROVAL

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Karen Cureton <drkarencureton@gmail.com>
Sent: Wednesday, February 7, 2024 10:59 AM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: OPPOSING BOARD CHANGES TO CE APPROVAL

Dear Board Members,

I feel very strongly that the changes being proposed will be detrimental to both Oregon licensees and a number of our beloved CE providers other than NUNM and OANP. Please consider altering the proposed rule changes to be more fair and reasonable to all parties, not just beneficial for the board, NUNM, and 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 are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to naturopathic doctors and are taught by naturopathic doctors.
- I don't support the proposed CE changes. They are restrictive and harsh. 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.
- I want access to pre-approved CE intended for naturopathic doctors and I don't want to be primarily limited to OANP and NUNM offerings. If OBNM honors approvals from other naturopathic boards and AANP, this greatly increases the offerings available to Oregon licensees like me and allows me to still learn from naturopathic doctors on the topics that are important to me. Learning from my colleagues in the field is important to me.
- I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.
- I disagree with making any drastic changes to the CE approval process given that the accuracy of OBNM's reporting system is under question. Any proposed changes must be based on accurate data about which CE providers Oregon licensees are using and how much and should be done transparently. Please delay any discussion of such changes until any discrepancies can be clarified. Once clarified, the actual numbers should be made publicly available to licensees so they can be best informed over any proposed rule changes.

Dr. Karen Cureton
Co-creator of the Wired for Wellness Program
Licensed Naturopathic Physician
Licensed Acupuncturist
Brain & Nervous System Retraining Coach
www.drkarencureton.com
www.getwiredforwellness.com

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CRUMPLER Robin * OBNM

From: BAPTISTA Mary Beth * OBNM
Sent: Thursday, February 8, 2024 12:52 PM
To: MEDICINE Naturopathic * OBNM; Dr. Kimberly Hindman N.D. L.Ac.
Subject: RE: OREGON LICENSEES: Changes to CE Rules Will Impact You. Deadline to comment 2/12.

Thank you for your message. You are correct, it is very different from what you are hearing from OBNM b/c the AANP email is both misleading and incorrect. I am sending out a response to all licensees and interested parties - you should receive it shortly.

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

From: Dr. Kimberly Hindman N.D. L.Ac. <khindman@healingdragon.net>
Sent: Wednesday, February 7, 2024 12:00 PM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: Fw: OREGON LICENSEES: Changes to CE Rules Will Impact You. Deadline to comment 2/12.

> You don't often get email from khindman@healingdragon.net. Learn why this is important

Hi,
I just received this email from AANP and what they are saying sounds very different from the emails we have received from OBNM about these changes. Can you please clarify.

THanks,
Kimberly

Dr. Kimberly Hindman

Naturopathic Physician, Licensed Acupuncturist
9320 SW Barbur Blvd, Suite 165
Portland, OR 97219
503.784.1027
www.healingdragon.net

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Sent with Proton Mail secure email.

------- 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.
To: khindman@healingdragon.net <khindman@healingdragon.net>

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
300 New Jersey Ave NW, STE 900, Washington, DC 20001

Unsubscribe khindman@healingdragon.net

higher logic

CRUMPLER Robin * OBNM

From: Rachael O'Connell <dr.oconnell@icloud.com>
Sent: Thursday, February 8, 2024 6:35 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Please don't omit AANP from your approved education providers (public comment)

You don't often get email from dr.oconnell@icloud.com. Learn why this is important

Yes thank you! I read the mass email you sent out. It actually aligned better with my initial understanding of your proposed rule changes so I'm glad to have the clarification. Glad the misunderstanding was cleared up!

There are no walls when you reach for the sky.

Rachael O'Connell, ND
thewarriordoc.com
clinic: nuturaclinic.com
artist site: linktr.ee/raddadlifestyle

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Thank you.

On Feb 8, 2024, at 5:31 PM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Rachael O'Connell, ND <dr.oconnell@icloud.com>
Sent: Wednesday, February 7, 2024 6:31 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Please don't omit AANP from your approved education providers (public comment)

You don't often get email from dr.oconnell@icloud.com. Learn why this is important

Hi there,

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

I have gotten so much enrichment and value from attending this conference annually and there are many of us who rely on the AANP for our variety of CME credits.

It would add unnecessary competition and uncertainty to my CME planning and more administrative time to my already overburdened schedule if AANP isn't approved.

I am deeply concerned about these proposed changes and I implore you to reconsider.

There are no walls when you reach for the sky.

Rachael O'Connell, ND
thewarriordoc.com
clinic: nuturaclinic.com
artist site: linktr.ee/raddadlifestyle

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phone number and destroy the original email.
Thank you.

CRUMPLER Robin * OBNM

From: Holly Castle, ND <drhcastle@gmail.com>
Sent: Thursday, February 8, 2024 5:43 AM
To: MEDICINE Naturopathic * OBNM
Subject: Pre-approved CE opportunities for Oregon licensees

You don't often get email from drhcastle@gmail.com. Learn why this is important

To Whom It May Concern:

I have continuously maintained a license in Oregon since I was originally licensed in January 1998 even though I have mostly lived and practiced elsewhere. I have been able to do this all these years because Oregon has allowed me to utilize CE that I was able to submit to the Board for approval or obtain online through pre-approved sources. The use of diverse sources for CE has become especially important to me as Oregon CE rules have changed to include Oregon specific requirements such as Ethics, Pain Management, and Cultural Competency— requirements that are not easily obtained outside of the state of Oregon.

In addition, I have deliberately maintained my license as a way of "paying back" the Board for approving my own courses over the years. Yes, some Oregon licensees have befitted from my courses. Others outside of the state have also benefitted because Oregon has set itself up as the gold standard for CE approval. Under the new rules that narrow the categories for CE approval and create onerous requirements for demonstrating relevance to Oregon licensees in particular, I would loose the ability to request CE approval for my courses even though I myself am an Oregon licensee.

Should the rules for CE approval significantly change as a result of the proposed new rules, i believe that Oregon licensees will loose the opportunity to engage in many high quality CE experiences. And out-of-state licensees like myself will seriously reconsider continuing to hold an Oregon license because we cannot meet the annual CE requirements for license renewal.

Best regards,

Holly Castle, ND, PLLC
8790 E. Via De Ventura #4398
Scottsdale, AZ 85258
(480) 922-8182
www.drhollycastle.com

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:29 PM
To: drsammerz@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Proposed CE Changes

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Sam Merz <drsammerz@gmail.com>
Sent: Thursday, February 8, 2024 10:40 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Proposed CE Changes

> You don't often get email from drsammerz@gmail.com. Learn why this is important

Good morning,

These proposed changes would greatly impact my ability to get my required CE. I am a member of AANP and would urge you to add AANP to the list of approved agencies.

Samantha Merz, ND
Naturopathic Physician
Deep Roots Family Medicine
(503) 477-1889

CRUMPLER Robin * OBNM

From: rebecca.krisko@gmail.com
Sent: Thursday, February 8, 2024 6:18 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Proposed CE rules changes

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

Thanks! I already read it thoroughly. I really appreciate the time and effort I'm sure it took to craft that response. I hope all interested parties read it carefully. But, I think you may suffer from all the policy language being a little "in the weeds" for most licensees.

I just don't want to have to apply for CE I get from the AANP conference. Sounds like you're working on trying to fix that. Thanks again! I know you're trying to do the right thing for the board and the licensees in Oregon.

Rebecca Krisko

> On Feb 8, 2024, at 6:06 PM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:
>
> Thank you for your comments.
>
> Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):
>
>
https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf
>
>
> 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
>
>
> -----Original Message-----
> From: rebecca.krisko@gmail.com <rebecca.krisko@gmail.com>

> Sent: Wednesday, February 7, 2024 12:22 PM
> To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
> Subject: Proposed CE rules changes
>
> [You don't often get email from rebecca.krisko@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]
>
> Is it true that these would eliminate the AANP as a pre-approved entity?
>
> What's the reasoning behind that?
>
> I am an AANP member and Oregon licensee who gets a lot of their CE through the AANP offerings. I would advocate for adding the AANP to the list of approved accreditation services, providers, and agencies unless there is a clear and convincing argument to do otherwise.
>
> Thanks for considering my thoughts and I'm hoping for a response so I can understand this decision better.
>
> Rebecca Krisko

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:32 PM
To: Dr. Lisa Fortes-Schramm, ND
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Proposed change to CE rules

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Dr. Lisa Fortes-Schramm, ND <roamingnd@gmail.com>
Sent: Thursday, February 8, 2024 8:37 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Proposed change to CE rules

To the OBNM Board,

I recently moved back to Portland, OR. I am an AANP member and am in process to obtain my Oregon licensee. I already hold a CA license and have a thriving practice in the Bay Area. I urge OBNM to add AANP to the list of "Approved accreditation services, providers, and agencies." Not doing so is definitely a deterrent to holding an OR license and joining the OANP. It's bad enough that there is so little cross-collaboration of CE between CA and OR.

I appreciate your thoughtful consideration,

Dr. Fortes
---_----------

Dr. Lisa Fortes-Schramm, ND, DTCM
Tel. 408-357-3422
Fax. 408-693-3840
sanjoseintegrativemedicine.com

San Jose Integrative Medicine
3535 Ross Ave, Ste 101
San Jose, CA 95124

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CRUMPLER Robin * OBNM

From: Marina Bazyuk <drmarinabazyuk@gmail.com>
Sent: Thursday, February 8, 2024 11:35 PM
To: MEDICINE Naturopathic * OBNM
Subject: proposed changes to the CE rules

You don't often get email from drmarinabazyuk@gmail.com. Learn why this is important

Hello,

I am writing to express my concerns about OBNM proposed changes to the CE rules.

I Do Not agree with the proposed changes. I would like access to more pre-approved opportunities that are specifically intended for Naturopathic Doctors, Not fewer. Please amend these changes so that there are inclusive and diverse pre-approved CE opportunities for Oregon licensees that specifically cater to Naturopathic Doctors and are taught by Naturopathic Doctors.

I urge the board to continue to allow NaturopathicCE.com to submit applications for CE approval. I like having access to diverse, on-demand, and online continuing education opportunities that are intended for naturopathic doctors. I like taking their courses and I don't want to have to complete my own self-directed applications in order to be able to use their services when it is so clear that NaturopathicCE.com serves Oregon licensees. Naturopathic CE offers hundreds of naturopathic continuing education courses that benefit Oregon licensees and they should be available as pre-approved CE opportunities for Oregon licensees.

Thank you in advance for your consideration.

Sincerely,

Marina Bazyuk, ND
Oregon License #: 1722

CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 6:01 PM
To: drdeeannnd@aol.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Regarding new rules

Thank you for your public comment.

Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

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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

From: Dr. DeeAnn Saber <drdeeannnd@aol.com>
Sent: Wednesday, February 7, 2024 12:19 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Regarding new rules

You don't often get email from drdeeannnd@aol.com. Learn why this is important

To the OBNM group,

As a longtime member of the AANP and a working physician for 15 years now, I appreciate having our national association offerings of qualified CE courses. I always enjoy going to the AANP annual conference and learning more about Naturopathic medicine. This is how we stay up on what's new, what is important and handle all our annual CE requirements.

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.**

Why you are doing this is beyond me, but I think and understand as a practicing physician that having the AANP resources to use and work with is very valuable and should be continued to be accessible to all our colleagues including the ones in Oregon.

Thank you, Dr. Saber

Dr. DeeAnn G. Saber, NMD
Transformational Medicine
2028 East Prince Road
Tucson, AZ 85719
Office# 520-209-1755
Fax: 520-798-2468
DeeAnn@TFMND.com
Home - Transformational Medicine (tfmnd.com)

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CRUMPLER Robin * OBNM

From: MEDICINE Naturopathic * OBNM
Sent: Thursday, February 8, 2024 3:03 PM
To: drdellaparker@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Rule change

Thank you for your message. Earlier this afternoon I sent a message to all licensees and interested parties responding to AANP's email regarding the proposed rule changes. Please read the Board's important corrections and clarifications regarding the current and pending rules and the impact on licensees. (link):

https://www.oregon.gov/obnm/Documents/Rules/2.8%20Email%20OBNM%20CORRECTIONS%20AND%20CLARIFICATIONS%20to%20AANP%20message%20to%20Oregon%20Licensees%20Changes%20to%20CE%20Rules%20Will%20Impact%20You%20Deadline%20to%20comment%202.12.pdf

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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

From: Dr. Della Parker <drdellaparker@gmail.com>
Sent: Thursday, February 8, 2024 2:29 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Rule change

You don't often get email from drdellaparker@gmail.com. Learn why this is important

I am urging you NOT to make this rule change. It is already hard enough to find CE approved classes that appeal to my interests. By taking these pre approved classes away you are making it much more difficult to meet requirements and submit for renewal. The process is hard enough without having to submit for approval on every class I attend. Please work to make the renewal process EASIER and not more difficult on busy practitioners.
Thank you!

Dr. Della Parker, ND
Stellar Health and Wellness
10151 SE Sunnyside Rd.
Suite 320

Clackamas, OR 97015
P (503) 344-6631 F (503) 850-4963
www.StellarHW.com

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CRUMPLER Robin * OBNM

From: Idaho Naturopathic Medicine <idnatmed@gmail.com>
Sent: Friday, February 9, 2024 9:52 AM
To: MEDICINE Naturopathic * OBNM
Subject: re: updating CE rule changes

Thank you for the opportunity to comment on the proposed rule changes for CE credits.
Please do not restrict access to on-line CE from entities such as Consult DrA or NaturopathicCE or educators that are not part of the OANP or NUUM system.

I have a small practice in Payette idaho on the border with Oregon. I provide services to rural eastern Oregon including patients from Vale, Ontario, Jordan Valley, and Baker City.
To my knowledge, I am one of very few or the only provider for most of Eastern Oregon.
I see these patients in my Idaho office and I maintain my OR licence so that I can provide Telehealth services as needed.
Many of these patients do not have local access to another licensed ND unless traveling for many hours.
These changes would put an undue burden on me to travel for CE. If the CE requirements change as proposed, I will have to spend even more money to serve this community. Alternatively, I may consider cancelling my OR licence and require my patients to see me in person for even short visits or to answer simple questions. This would harm the ability to maintain a doctor-patient relationship and put more burden on rural communities.

Please reconsider your decision to change the CE requirements.
Instead of making changes now, perhaps working for solutions with on-line CE providers could provide an avenue to achieving everyone's goals.

Sara Rodgers, NMD, C.Ac
Idaho Naturopathic Medicine
www.idnatmed.com

Office hours 9:30 am-1pm, 2-5:00 pm Monday-Thursday
Closed Friday.

PH: 208-275-0007
FAX: 208-514-4563
www.idnatmed.com

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CRUMPLER Robin * OBNM

From: Jennifer Brennan-Kos <jenniferbk@gmail.com>
Sent: Friday, February 9, 2024 2:43 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE CHANGED

You don't often get email from jenniferbk@gmail.com. Learn why this is important

To whom it may concern,

I don't support the proposed CE changes. They are restrictive and harsh. 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.

Thank you for your time and consideration.

Jennifer Brennan-Kos, ND
License # 1034

CRUMPLER Robin * OBNM

From: Bonnie Nedrow <drbonnie09@gmail.com>
Sent: Friday, February 9, 2024 9:52 AM
To: MEDICINE Naturopathic * OBNM
Subject: CE Rule Change

You don't often get email from drbonnie09@gmail.com. Learn why this is important

Dear OBNE,

I have been following this matter and see that it is fairly complex and even confusing.

First, it seems AANP will remain a source of CE for those of us licensed in Oregon despite the proposed rule change. That is important to me.

Second, it seems that Naturopathic CE will not be automatically approved. I rely on this site for last minute filling in the gap at the end of the year. Life is busy and it is reassuring that when winter break happens, I can easily access interesting and useful naturopathic focussed CE. I have taken so many courses from allopathic sources that are simply not at the level of education I expect. I have never been disappointed by the quality of Naturopathic CE courses.

Beyond those two resources, I am not sure if the rule change would negatively affect me. I am also unsure if the rule change will be a benefit.

thank you for your consideration, Bonnie

CRUMPLER Robin * OBNM

From: Bridghid McMonagle <drmcmonagle@lakeoswegohealth.com>
Sent: Friday, February 9, 2024 1:00 PM
To: MEDICINE Naturopathic * OBNM
Subject: CE

To Whom It May Concern,

I find diverse CE very important for my focus in medicine.
Please do not limit our options.
Would it be easier, once an ND sends in documentation for CE approval, it is added to the spreadsheet so others don't have to apply for the same course to get CE?
Does that make sense?
Also, maybe add timelines? You have to submit for CE within a month of the course you take?
Could we ask for volunteers to help with the processing?
I really don't want to be limited to AANP or OANP conferences. I find them to be very limited.
Thank you,
Dr. Bridghid McMonagle

CRUMPLER Robin * OBNM

From: Dr. Coplin <drmarcuscoplin@gmail.com>
Sent: Friday, February 9, 2024 8:59 AM
To: MEDICINE Naturopathic * OBNM
Subject: Comment on rule change

You don't often get email from drmarcuscoplin@gmail.com. Learn why this is important

1 as a physician who is planning their year around CE events and credits, the uncertainty factor about IF a course will be approved is the most concerning aspect of this. If there was a public checklist of requirements that could be provided by OBNM and perhaps each course could advertise their ability to meet that checklist, that would make me, as an applicant, more confident.
2 as an educator, I plan CE courses and trainings mostly outside of the state of Oregon. Typically I would get my approval through the AANP and have attendees from all over the USA. If there is a straightforward and cost conscious way to get my course approved through Oregon so that I can advertise my course as being acceptable for CE for Oregan docs that would help.

The rationale for the rule change makes logical sense, however the reality of the uncertainty factor both on doctors and educators seems unnecessarily burdensome.

--
Dr. Marcus Coplin, ND
DrCoplin.com
Naturopathic Healthcare
Authority Magazine - Total Health with Dr. Coplin
Authority Magazine - Wellness Reimagined with Dr. Coplin
Medical Director
The Springs Resort - Pagosa Springs, Co
The Murrieta Hot Springs Resort - Murrieta, Ca
Director of Hydrothermal Medicine
Balneology.org
IG: DrCoplinND

CRUMPLER Robin * OBNM

From: Dr. Darcy Ries <doctor.darcy.nd@gmail.com>
Sent: Friday, February 9, 2024 10:30 AM
To: MEDICINE Naturopathic * OBNM
Subject: Feedback re: proposed OBNM changes to CE requirements

To Whom It May Concern:

I know some changes to CE requirements are on the table and would like to weigh in on this. I acknowledge that limiting the approved providers of CE makes for less administrative work for the Board, and yet I feel the proposed changes would too greatly limit naturopathic CE options. Having access to pre-approved CE that's specific to naturopathic doctors is pretty key in preserving the naturopathic way in which we practice.

While I understand that changes are said to include CNME, FNMRA, and NANCEAC approved courses, I also am aware that many smaller CE events and online courses don't have the funds to pay to have their programs approved by some of the above entities. In pursuing approval, this added cost gets rolled into the program cost and makes it more expensive for providers than it would have otherwise been. OANP and NUNM have the funds to approve their courses, whereas others, especially individual entities, might now. I don't want to be primarily limited to OANP and NUNM offerings.

Please consider the broad view and needs of OR licensees and our wish to access a wide variety of quality CE from our colleagues in the ND community.

Thank you,
Dr. Ries

Darcy A. Ries ND
Naturopathic Physician
200 E. 2nd St. Suite 202 Newberg, OR 97132
(503) 277-3113
www.drdarcyries.com

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CRUMPLER Robin * OBNM

From: Carol McIntyre <cccmnd@yahoo.com>
Sent: Friday, February 9, 2024 12:55 PM
To: MEDICINE Naturopathic * OBNM
Subject: NaturopathicCE

I write to you and ask that you consider the value of Naturopathic CE to the ND community by providing easily accessible CE credits with a variety of topics which are taught by a variety of professionals including NDs. It is important that NDs have a variety of access points to acquire their required CEs based on availability from different sources. I believe that Naturopathic CE does help to provide that for our profession and has an upstanding quality of standard by which they operate. This would be a lost resource for many practitioners. I would like to see it continue to be an available resource for NDs to acquire their required CEs.
Thank you~

Be Well~

Carol McIntyre, ND, MSOM, LAc.

cccmnd@yahoo.com
503-429-3928

CRUMPLER Robin * OBNM

From: Timothy Miller <timothymillernd@gmail.com>
Sent: Friday, February 9, 2024 11:27 AM
To: MEDICINE Naturopathic * OBNM; BAPTISTA Mary Beth * OBNM
Cc: Naturopathic CE; Timothy Miller
Subject: Public Comment

Mary-Beth and Robin,

Can you please confirm receipt of this email? Please see my public comment below.

Thank you!
~Tim

Dear Oregon Board of Naturopathic Medicine,

Like many other Oregon licensees, I am concerned with the proposed rule changes as it relates to the continuing education approval process. As an Oregon licensee myself and as the owner and founder of NaturopathicCE.com, I can see serious undesirable consequences from multiple angles.

After having a conversation and multiple email exchanges with the Executive Director, it's clear that the board is overwhelmed by the current number of applications that it reviews. While the board's position is completely understandable, the current proposed rules changes are harsh and limiting, and while they benefit OBNM and decrease its workload, it comes at the great cost of licensees and CE providers. **If the board is feeling challenged by the existing rules, it may be beneficial to consider adjusting the rules in a way that benefits <u>everyone</u>.** This includes ensuring ongoing access to pre-approved educational offerings designed specifically for naturopathic doctors, with a focus on online and on-demand courses.

After engaging in multiple discussions with fellow Oregon licensees, it's evident that there is a significant level of concern regarding the proposed rule changes. Licensees want access to online, diverse, approved options for continuing education and don't want to create more work for themselves through self-directed applications for mainstream naturopathic continuing education providers (NaturopathicCE.com, ConsultDrAnderson.com, and NESH come to mind). It's important to note that not all Oregon licensees reside or practice in Oregon, as many are graduates of NUNM and live in other licensed or unlicensed states while maintaining their Oregon license without actively needing or using it. I have been informed privately by some licensees that they are contemplating allowing their Oregon license to lapse due to the imposed restrictions. **Especially during a time of financial strain on the profession and its institutions, providing value and ease for Oregon licensees is critical for the board to ensure the unnecessary loss of licensees and license fees.** The primary concern by licensees is the desire for diverse, approved continuing education offerings, as licensees view it as the board's responsibility to provide such opportunities. **With the challenges already faced in managing practices and personal lives, <u>licensees seek support</u> rather than additional restrictions for obtaining their CE.**

With my hats as an Oregon licensee, CE instructor, and CE provider, I have spent a considerable amount of time to understand the repercussions of these proposed rule changes and to find solutions that allow for a win-win-win situation: decreasing the workload for OBNM while upholding its responsibility of accepting quality educational offerings, maximizing diverse and readily accessible pre-approved CE opportunities for licensees that are specifically intended for naturopathic doctors, and being considerate of CE providers.

One of the things that makes the naturopathic profession so extraordinary is its diversity. While we all unite in the tenets and philosophy of naturopathic medicine, the modalities that we incorporate into practice are varied and unique. Some naturopaths practice physical medicine, others homeopathy, IV therapy, etc., etc. **There are other ways for the Oregon board to minimize its workload while still ensuring diverse approved CE opportunities** for licensees that also doesn't require more work on behalf of licensees. Further, attending synchronous events (especially in-person ones) is a hardship for most people. The Oregon board should reflect its rule changes in a way that understands the needs and ability of Oregon licensees in this digital age: on-demand opportunities remain an indispensable asset to Oregon licensees.

I realize my position makes me biased, which is why I decided to create two petitions, to demonstrate the solidarity of Oregon licensees while at the same time keeping the interests of the board in mind, and request very clear and reasonable amendments to the proposed rule changes.

Although the petitions were active for just one week, nearly 200 Oregon licensees have already signed the first petition and nearly 100 have already signed the second. To allow for more signatures until the board meeting, I will send the petitions to the board on Monday along with the list of signatories. The first petition outlines three specific changes to the CE approval process, while the second petition focuses on urging the board to accept applications from NaturopathicCE.com and to emphasize the value that Oregon licensees place on NaturopathicCE.com and its extensive catalog of naturopathic courses.

Petition #1

This petition can be found at: https://form.jotform.com/240227508057150

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

Petition #1 – Change #1:

While it's nice to have options of courses approved by CE accreditors like the Oregon Board of Pharmacy, Oregon Health Authority, Oregon Medical Board, Drug Enforcement Administration (DEA), the reality is that these accreditors are not naturopathic in their foundation. And even though the proposed rule changes technically increase the number of accreditors, the actuality is that it does not increase the number of approved courses specifically intended for naturopathic doctors. **The reality is the proposed rule changes significantly decrease the number of approved courses specifically intended for naturopathic doctors.**

In addition to these accreditors, **if OBNM honored approvals from other naturopathic boards in North America, as well as AANP, it would greatly expand the approved continuing education opportunities available to Oregon licensees.** This is a standard practice of naturopathic boards that do not have the resources to review and approve applications themselves. This solution would reduce the workload for OBNM while still ensuring access to quality educational offerings for Oregon licensees that are specifically designed for naturopathic doctors and approved by boards/organizations that serve naturopathic doctors.

[Update: a more recent communication from the board expressed that accepting AANP approvals directly would be prohibited by Oregon Administrative Rule; so, it is understandable that AANP would not be able to be included specifically in Change #1 the way it is currently written. At a minimum, AANP should be able to submit applications for CE approval, which the board has mentioned it would consider. However, this concession, while appreciated, is not significant enough.]

Petition #1 – Change #2:

Another concern with the proposed rule changes is the restrictions imposed on specialized categories of continuing education, like pharmacology, ethics, and IV therapy. Since these categories pose the strictest requirements of continuing education hours for Oregon licensees, eligibility for application submission should be the most liberal. It is OBNM's responsibility to ensure that Oregon licensees have a multitude of pre-approved CE for specialized categories. And, specialized CE category applications represent a very small number of overall applications, so restricting them isn't necessary (even if there are restrictions on general education applications). **If OBNM waived application eligibility restrictions for specialized CE categories, it wouldn't significantly increase the board's workload, but it would greatly increase the approved offerings available to Oregon licensees.**

Petition #1 – Change #3:
While it's understandable that OBNM is overwhelmed by the review of applications, OBNM is also unnecessarily increasing its own workload by reviewing and re-approving the same applications year after year. Currently, the maximum approval for a CE application is 2 years. Other naturopathic boards allow approval for the course's lifetime, barring any significant changes to the content or relevance of the course to licensees (in which case a new application and approval would be required). Otherwise, another application isn't required. **If the board extended its approval duration, it would greatly reduce the workload on the board while maintaining numerous educational offerings for licensees.**

Petition #2

This petition can be found at: https://form.jotform.com/240228447541151

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

Petition #2 – Change #1:
The reality is that for-profit, out-of-state, independent CE providers like NaturopathicCE.com (and ConsultDrAnderson.com, NESH, and many others) benefit the naturopathic profession. Most of NaturopathicCE.com's instructors are naturopathic doctors, many of whom are Oregon licensees and Oregon residents. The other reality is that independent CE providers like NaturopathicCE.com support Oregon licensees specifically. NaturopathicCE.com's data shows over 230 Oregon licensees completed courses on its website in 2023 and nearly 300 Oregon licensees completed courses on its website in 2022. This equates to about 800 unique course submissions per year by Oregon licensees. NaturopathicCE.com has been working with OBNM for approximately the past 10 years and is a trusted partner and provider of continuing education for naturopathic doctors. **If the board extended eligibility of application submission to NaturopathicCE.com, this would avail hundreds of on-demand, online courses** for Oregon licensees including specialized topics like pharmacology, ethics, IV therapy, cultural competency, and pain management through the OBNM application process.

It is understandable that the board would want to make some changes. But I also invite the board to consider the consequences of its current proposed rule changes and how it affects licensees and CE providers. **There are other solutions available that achieve the same goal for the board while still supporting licensees and providers.**

Thank you for your time, attention, and consideration!

Sincerely,
~Timothy Miller ND, LAc
Owner and Founder of NaturopathicCE.com
Oregon Licensee

February 9, 2024 **Delivered via Email**

Oregon Board of Naturopathic Medicine
800 NE Oregon Street, Ste 407
Portland, OR 97232
marybeth.baptista@obnm.oregon.gov

Dear Members of the Board:

On behalf of the American Association of Naturopathic Physicians (AANP,) we respectfully submit the following comments for consideration regarding proposed changes to continuing education for Oregon NDs. We are certainly mindful that the OBNM's goal with these proposed rules is to mitigate administrative burden, and support efforts to increase consistency and alignment in the CE approval process across the profession. We do, however, have concerns that the proposed rules will create a barrier to accessing ***pre-approved naturopathic CE*** for some Oregon licensees, leading to unnecessary uncertainty, risk, restriction of options and/or administrative burden for those licensees, and potential long-term degradation in proficiency in naturopathic medicine.

Summary of draft rule effects:

- Drastically limits the entities which are eligible to get **naturopathic** CE programs automatically approved or pre-approved from dozens to only 10 entities.
- Triples the entities from which licensees can get (**non-naturopathic) conventional medical** CE programs automatically approved from 2 to 6, which could have a paradoxically harmful effect on long-term proficiency in naturopathic medicine.
- Increases the administrative burden on some Oregon licensees, who would need to submit individual approval applications to OBNM for all naturopathic CE not originating from the 10 naturopathic entities enumerated, with the commensurate uncertainty of whether a program will be approved after the provider has already registered, paid, and participated in the activity.
- Eliminates all pathways for the AANP and other naturopathic CE providers, including most state and specialty associations, to have naturopathic CE automatically or pre-approved for Oregon licensees. The only remaining option would be to apply for accreditation with NANCEAC, which is administratively and financially prohibitive for most smaller naturopathic state, specialty, and other CE providers.

Proposed Adoption of 850-040-0215

The draft rule proposes adding several accreditation services, providers and agencies whose continuing education programs would automatically be accepted for continuing education by the Board. The draft rule is promoted as expanding the sources of continuing education that would not require board review. While this is

true for ***conventional CE***, it is the exact opposite for ***naturopathic CE***. There are several elements in this draft rule that require attention for clarity, accuracy, and effect.

1. "Approved accreditation services, providers, and agencies" - This language is confusing. Is the intent that each entity be "accredited?" i.e., an accreditation service, an accredited provider, or an accreditation agency? Alternatively, is the intent to allow for automatic approval of CE activities from a list of Board-accepted sources? If so, a suggested alternative might be to borrow from the California Board of Naturopathic Medicine's rule, which states: "The continuing education requirements of this section may be met through continuing education courses approved by…"

2. The following entities included in the draft rule do not actually accredit, approve or otherwise offer continuing education for physicians, and should not be included in the list:

   (c) Council on Naturopathic Medical Education (CNME)
   Note: CNME is recognized by the US Department of Education as the accrediting entity for naturopathic medical education ***programs*** but not for continuing education. CNME *does* have an accreditation standard (Standard XI) for Continuing Medical Education that outlines what naturopathic medical programs which offer CE must have in place to maintain academic control over the courses.

   If the intent is to allow CNME-accredited naturopathic medical institutions, then this should be articulated in the list, which would render inclusion of NUNM in 850-040-0215 (2)(a)(1) redundant.

   Of note, OBNM has made statements that other entities "may apply for accreditation from the expanded list of approved accreditation agencies, which includes CNME…" This is **incorrect**. CNME only accredits naturopathic medical schools. Nobody else can apply for accreditation for continuing education to CNME.

   (d) The Federation of Naturopathic Medicine Regulatory Authority (FNMRA)
   Note: The FNMRA operates NANCEAC, but NANCEAC is also included in the list and the Federation does not itself approve or offer continuing education outside of NANCEAC.

   (i) Drug Enforcement Administration (DEA)
   Note: It is our understanding that the DEA does not itself offer CE or accredit CE providers or programs. However they have promulgated regulations that list accredited entities that may provide trainings that meet their requirements, especially related to substance use disorders and the new MATE Act requirements. All of these accredited entities offer conventional.

3. The draft rule would restrict the pathways to get naturopathic CE automatically approved or pre-approved to only NUNM, OANP, and the 8 organizations accredited by NANCEAC, while simultaneously expanding pathways to more conventional medicine sources that would automatically be approved. The additional barriers to get naturopathic CE could have a long-term negative unintended consequence on proficiency in naturopathic medicine, naturopathic approaches and

naturopathic modalities.

Currently, dozens of naturopathic CE providers offer thousands of hours of naturopathic-specific education. Limiting automatic approval or pre-approval to such a restricted list of naturopathic CE providers creates a disincentive to choose CE from other naturopathic sources, thereby restricting the diversity of naturopathic learning and creating a disproportionate disadvantage for licensees who choose these CE providers.

Further, conventional CE accreditors rarely approve naturopathic CE, CE from naturopathic entities, or CE presented by naturopathic speakers.

This approach could have a perverse effect on long-term proficiency in naturopathic medicine, as licensees unwilling to assume more administrative burden or risk may drift toward CE from the expanded list of automatically approved conventional sources rather than from a very small list of pre-approved naturopathic sources. This is especially true in the specialty CE categories such as pharmacy, pain management, ethics, suicide prevention, cultural competency, and substance abuse disorder.

For licensees who do choose CE from other naturopathic sources, the dramatic limitation in options creates unnecessary administrative burdens and financial risks for licensees. They must now gamble on individual program approval after registration and payment, potentially wasting resources on unapproved courses.

4. Further, in the introduction email announcing the proposed changes, OBNM stipulates that "OBNM is not [in] line with other regulatory agency approval processes," and implies that these proposed changes will align OBNM with other regulators. One of the primary ways that OBNM differs from other regulators is that **OBNM is the only regulatory board in the country that does not recognize AANP-approved CE as automatically approved for Naturopathic Doctors.**

   Of all the other regulatory boards, 8 states do not have a preapproval mechanism whatsoever, 5 states allow for broad automatic approval from state or nationally recognized naturopathic organization, and 13 specifically enumerate AANP-approved CE as accepted by the Board in their rules.

   The AANP is both a CE provider and a CE approver, and is one of the oldest CE approving entities for naturopathic professional development in the US. As a non-profit association, all revenues generated from AANP's CE approval services go directly toward AANP's programs to educate about and advocate for the naturopathic profession.

   It has also been communicated to licensees that professional associations like the AANP are not pre-approved providers because "associations host programming and approve programs…prohibited by Oregon Administrative Rule." **This is not entirely correct.**

The AANP has a rigorous CE approval Handbook and Guidelines which was brought into close alignment with NANCEAC's CE requirements several years ago. It is managed by a naturopathic doctor on staff and volunteer ND reviewers. The CE approval process includes 3 core **Standards of Excellence, which align with Oregon Administrative Rules.** Standard 1 and 3 specifically address OAR 850-040-0210(7)(c), (d), and (e). Standard 2 on **Independence from Commercial Bias** addresses 850-040-0210(7)(a) and enumerates 13 key elements to ensure educational content, even if sponsored, is free from bias and conflict of interest, both real and apparent. This standard also closely aligns with NANCEAC standards for programs with commercial support.

The AANP does not approve CE for *any* entity that does not meet these Standards of Excellence. While it *is* true that we might sometimes host a commercial or business development program, we make it clear that this content is NOT approved for CE, and there is no mechanism to obtain a CE certificate.

Where NANCEAC only accredits organizations which provide CE (CE Providers), the AANP reviews and approves ***individual CE activities*** from a wide variety of CE providers and activity hosts. Currently, NANCEAC only accredits 8 CE Providers for the naturopathic community. In 2023, the AANP approved 642 CE hours, spanning all content categories, from ~30 different CE hosts which range from naturopathic state and specialty associations, integrative medicine organizations, industry researchers, and many more. Outside of OBNM, the AANP arguably reviews, approves, or rejects the largest volume of naturopathic CE than any other entity.

The AANP fills a gap for small CE activity hosts (i.e., many naturopathic state and specialty associations) who cannot meet NANCEAC's fee structure or program management requirements. Further, because we review attendee lists and send CE certificates for many of the activities that we approve, we also know that the majority of activities are attended by some number of Oregon licensees.

As currently written, the draft rules would leave Oregon as the only state in the nation that does not allow automatic approval or a pre-approval process for AANP-approved CE. And because most of the CE approved by AANP are not live events with more than 10 people in Oregon, the only mechanism that Oregon licensees would have to seek approval for the 600+ hours of CE per year approved by the AANP is to submit an individual application to the OBNM for each activity.

Further, in any given year, the AANP counts between 20-100 Oregon licensees who attend the AANP convention, not to mention all Oregon licensees who attend our own webinars and other CE events.

These proposed rules will, again, create a new and unnecessary burden on Oregon licensees, and will restrict the diversity of naturopathic CE available to licensees who are unwilling to accept the administrative burden or the risk of a program being rejected after they have registered, paid, and attended. It will also very likely lead to OBNM receiving multiple duplicate applications from different people for attending the AANP Convention or other AANP activities. Even though once approved, a

course will be added to the OBNM database as approved for all, OBNM staff will still need to review all applications, verify if the course has been approved, and respond to the applicant appropriately.

For all of the above reasons, and to truly come into alignment with the approach of other regulatory authorities with continuing education, we respectfully suggest the following changes be made to the draft rule:

(1) ~~Approved accreditation services, providers, and agencies~~ *Continuing education activities are considered pre-approved by the Board if accredited, produced, or approved by:* (Note this was modified from the California Board of Naturopathic Medicine language mentioned above)
(a) Accreditation Council for Continuing Medical Education (ACCME)
(b) ~~American~~ *Accreditation* Council ~~on~~ ***for*** ~~Pharmaceutical~~ ***Pharmacy*** Education (ACPE), (Note ACPE's name has changed)
~~(c) Council on Naturopathic Medical Education (CNME)~~ (or alternatively *Council on Naturopathic Medicine Education (CNME)-accredited naturopathic medical institutions)*
~~(d) The Federation of Naturopathic Medicine Regulatory Authority (FNMRA)~~
(e) North American Naturopathic Continuing Education Accreditation Council (NANCEAC) *of the Federation of Naturopathic Medicine Regulatory Authorities (FNMRA)*
(f) Oregon Board of Pharmacy
(g) Oregon Health Authority
(h) Oregon Medical Board - Medical, Osteopathic approved education only
(i) ~~Drug Enforcement Administration (DEA)~~ *American Association of Naturopathic Physicians* (Note: this would retain access to 600+ hours of naturopathic CE spanning all categories, from a broad variety of vetted sources, ***all of which meet OBNM's standards***).

(2) Entities Eligible to Apply for Program Approval, Application Process
(a) ~~Entitites~~ *Entities* Eligible to Apply for Program Approval:
(i) ~~National University of Naturopathic Medicine (NUNM)~~ (Note: Strike ONLY if clarifying above that all CNME-accredited institutions qualify for automatic approval)
(ii) Oregon Association of Naturopathic Physicians (OANP)
(iii) American Association of Naturopathic Physicians (AANP)

(b) ~~*NUNM,*~~ *AANP* and OANP must submit the following for program approval: (Note: Strike NUNM ONLY if clarifying above that all CNME-accredited institutions qualify for automatic approval)
(i) Completed continuing education program application provided by the Board
(ii) Syllabus or course outline, and agenda
(iii) Sample course materials (maximum 10 pages)
(iv) *Credentials, biography,* Curriculum vitae or resume for each presenter
(v) Sample certificate of completion with the course and licensee name, and hours earned per program subject area.
(vi) Additional information or materials at the request of the Board

Proposed Adoption of 850-040-0220

For licensees who must submit individual applications to approve CE that is not automatically approved or pre-approved per 850-040-0215, we recommend the following changes to the submission process of materials that still validate the relevance of the CE content, but make it a slightly easier process for the licensee.

The list of items that must be submitted as documentation has long posed an undue burden on licensees. For example, most CE activity hosts do not routinely distribute either a speaker's complete CV or resume, or a course syllabus or outline. Either a licensee must take the time to request this additional information from an activity host, or they submit their application for an activity to be approved without this documentation, which technically means they are not in compliance with the rule.

Further, limiting sample course materials to 10 pages max is unrealistic, when participants are usually given entire pdfs of slide decks and may attend a CE activity that consists of multiple speakers over many days. While we understand the need to verify content quality and relevancy, we recommend the following changes:

> (1) Licensee attendees: Licensees may apply for approval of a completed structured continuing education program not accredited, provided, or approved per 850-040-0215, that meet the criteria set forth in 850-040-0230. Licensees must submit the following no later than 30 calendar days after the date of completion:
> (a) Completed application for approval provided by the Board
> (b) Certificate of Completion, including course date and total number *and category(ies)* of hours completed
> (c) Syllabus~~, or~~ course outline*, brochure, marketing materials, or program objectives*
> (d) Sample course materials ~~(10 pages max)~~
> (e) *Credentials, biography,* Curriculum vitae or resume for each presenter
> (f) Additional information or materials at the request of the Board

We further recommend in 850-040-0220 (2) the following changes.

> (2) ~~Licensee~~ Program Host: Licensees who host a live, in-person, structured continuing education program, in the State of Oregon, attended by a minimum of ten (10) Oregon licensees, may apply for approval on behalf of the attendees by submitting the following no later than 30 calendar days after the date of completion:
> (a) Materials listed in Section 1.
> (b) Participant sign-in sheet showing attendance of a minimum of ten (10) Oregon licensees.
> (c) Copy of the certificate of completion ~~for a minimum of ten (10) Oregon licensed attendees~~

A program should be able to be hosted in Oregon with live attendees without the program host being a licensee. Compounding pharmacies, other healthcare professions such as chiropractors and acupuncturists, or even out of state NDs (i.e., a Washington licensee) might host CE activities in Oregon for naturopathic doctors.

Paragraph (2)(b) states a program host must prove in-person attendance by 10 people, and we believe the intent of (2)(c) is to merely see an example of the CE certificate provided. As currently drafted, it could be

interpreted by a Program Host that they need to submit 10 individual certificates of completion, which merely adds unnecessary volume to the application.

Proposed Adoption of 850-040-0230

We applaud OBNM for providing further clarity on the Board's expectations in each of the CE content areas, and especially support the inclusion of some business management and practice development programs as continuing education provided it enhances practice management skills. This also aligns with the AANP's Standard of Excellence 1 - that we approve CE for the "management of healthcare practices and businesses for the purpose of improving patient clinical outcomes."

The Board may also want to consider adding under Activities Eligible for Approval 850-040-0230(2) these two additional activities which are included in several other state naturopathic CE rules:

- Attendance at a regulatory board meeting
- Attendance at a general membership meeting of a naturopathic professional association

Thank you again for the opportunity to provide feedback on these changes to Oregon's continuing education requirements. We appreciate how challenging it has been to manage the volume of CE applications and your ongoing efforts to find the right balance to use OBNM resources wisely and support licensees. We are confident that by working together, we can find the right balance without creating additional burdens or risks for Oregon licensees.

Sincerely,



Laura Culberson Farr
Executive Director, AANP

WASHINGTON ASSOCIATION OF NATUROPATHIC PHYSICIANS

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Oregon Board of Naturopathic Medicine
800 NE Oregon Street, Suite 407
Portland, OR 97232

Re: Changes to Continuing Education Approval Process (OAR 8500-040-0215, 0220, 0230)

9 February 2024

To Whom It May Concern:

I am writing on behalf of the Washington Association of Naturopathic Physicians (WANP) to provide some feedback and context that might be helpful to the Oregon Board of Naturopathic Medicine (OBNM) as it considers making substantive changes to the continuing education approval process for Oregon-licensed naturopathic physicians.

I want to commend OBNM for taking this step toward increased consistency across our profession in the approval of continuing education credits for naturopathic physicians (NDs) and to thank OBNM for the incredible number of hours it has spent reviewing and approving continuing education from all over the world. I am completely supportive of OBNM shifting its focus to better align with other state practices in an effort to better serve Oregon-licensed NDs.

For context, the WANP is recognized in Washington Administrative Code 246-836-080[1] as an entity that can approve or offer continuing education (CE) to Washington-licensed NDs. Therefore, we neither rely on nor routinely seek out approval of OBNM for our CE activities. Historically, we have only sought OBNM approval of WANP CE when we have been asked to do so by an Oregon-licensed ND interested in one of our courses or conferences. I offer this context early on as an acknowledgement that the proposed changes OBNM is considering will have little to no effect on the WANP as an organization. However, as a border state to Oregon, we do share many licensees who must meet the CE requirements of both of our states and I urge OBNM to consider the impact of these changes on these dual-state licensees and the ease with which they can obtain their required CE in both states.

<u>OAR 850-040-0215: Approved accreditation services, providers and agencies, entities eligible for program approval</u>
We share the concerns that have no doubt been raised to OBNM already about this proposed list of approved accreditation services and entities eligible for program approval. While the communications from OBNM indicate that accreditors/providers of CE have been added, in all practical senses, this is not true in the case of naturopathic-focused CE options. The Council on Naturopathic Medical Education (CNME) is the U.S. Department of Education-recognized accreditation authority for naturopathic medical schools. To my knowledge, this organization does not provide, approve, or accredit on-going continuing education for the naturopathic profession. While this entity appears to be a new addition, it does not actually increase the naturopathic-focused CE options available to Oregon-licensed NDs. Additionally, the North American Naturopathic Continuing Education Accreditation Council (NANCEAC) is a council run and overseen by the Federation of Naturopathic Medicine Regulatory Authorities (FNMRA)[2] such that including both of these

[1] https://app.leg.wa.gov/wac/default.aspx?cite=246-836-080
[2] https://www.fnmra.org/NANCEAC-Continuing-Education

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agencies on the list of pre-approved CE providers is duplicative and unnecessary. Again, in reality, having both agencies named in this rule does nothing to increase the naturopathic-focused CE options for Oregon-licensed NDs.

The proposed rule change goes on to remove the opportunity for any entities other than the Oregon Association of Naturopathic Physicians (OANP) and the National University of Naturopathic Medicine (NUNM) to apply for approval of naturopathic-focused CE aimed at Oregon-licensed NDs. Of course, the most notable exclusion to this list is the American Association of Naturopathic Physicians (AANP), which currently offers or approves more naturopathic-focused CE than any other organization (possibly excepting OBNM).

This resulting shift away from naturopathic-focused CE providers who seek out and utilize naturopathic physicians as educators for the naturopathic physician community and toward an ever-widening range of conventional CE providers who often intentionally exclude naturopathic physicians as educators is highly troubling to the WANP as an organization committed to the recognition, improvement, and advancement of the naturopathic medical profession. We are concerned that OBNM's efforts to expand options for pre-approved CE for Oregon NDs will inadvertently drive Oregon-licensed NDs to pursue primarily or exclusively CE offered by conventional organizations, thereby reducing or eliminating their on-going exposure to foundationally naturopathic therapies and licensed naturopathic physicians as educators. We do not imagine this is the intent of OBNM, but we are concerned that the appearance is to remove exposure to and therefore discredit even high-quality CE offered by naturopathic entities.

While we fully understand and support what OBNM is moving toward here – the standardization of continuing education through utilization of NANCEAC as the naturopathic profession's accreditation body – we fear that NANCEAC is not yet capable of handling the sheer volume of requests necessary, nor does NANCEAC provide a pathway for individuals or for smaller start up naturopathic organizations that cannot afford the fees. We are also concerned that the business model of NANCEAC (and most or all of the other pre-approved entities on OBNM's proposed list) is to accredit organizations rather than individual CE activities and content. When it comes to careful consideration of actual course content, we submit that the organizations holding to the highest standards at this time are the naturopathic professional and specialty associations that have been offering, evaluating, reviewing, and improving CE for many decades, including the AANP, OANP, WANP, GastroANP, OncANP, etc. In fact, at the present time, these are the ONLY organizations that provide a path toward CE approval (outside of OBNM) for individual providers.

Therefore, we urge OBNM to consider adding AANP, OANP, and NUNM to the list of "Approved accreditation services, providers, and agencies" listed OAR 850-040-0220 (1), and maintaining a path for approval (even if it is through one of these named entities) for other naturopathic-focused CE providers, to ensure that ND licensees in Oregon have access to a diversity of naturopathic-focused CE content that they are certain will be recognized by OBNM. This would certainly improve the balance of naturopathic versus conventional CE options for Oregon-licensed NDs.

<u>OAR 850-040-0220: Licensee application for continuing education approval, process, and limitations</u>
As an organization that provides CE for naturopathic physicians that frequently interests Oregon-licensed NDs, we urge OBNM to consider adjusting the proposed language here to allow individual licensees to apply for approval *in advance of* completing CE activities, in addition to applying "for approval of a completed structured continuing education program…." This serves Oregon licensees by allowing them to

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understand whether a particular CE activity is going to be counted for their Oregon license *prior to* committing the time and the money to such an endeavor. This small change should maintain the stated goal of OBNM to reduce the number of applications received by other entities and should guarantee that OBNM is considering only those CE activities in which Oregon licensees are interested. We also want to share our perspective that requiring full resumes/CVs from presenters is neither standard nor routine practice and adds a significant step for individual or entity applications. We suggest that full bios from presenters could stand in as a substitute for resumes/CVs.

We propose the following changes in this section:

"(1) Licensee attendees: Licensees may apply for approval of a ~~completed~~ structured continuing education program not accredited, provided, or approved per 850-040-0215, that meet the criteria set forth in 850-040-0230. Licensees must submit the following no later than 30 calendar days after the date of completion:

(a) Completed application for approval provided by the Board
(b) C~~ertificate of Completion, including c~~ourse date and total number of hours completed or expected
(c) Syllabus or course outline
(d) Sample course materials (10 pages max)
(e) Curriculum vitae, ~~or~~ resume, or bio and credentials for each presenter
(f) Additional information or materials at the request of the Board"

We further urge OBNM to include language clarifying that, once a course or offering is approved for one licensee, that other licensee attendees may also receive credit for the CE activity. Again, this should drastically reduce the number of applications being submitted to OBNM for review and approval.

We are incredibly grateful for your time and consideration of these comments. Please do not hesitate to reach out with any questions.

Thank you for everything you do in service to the naturopathic profession in Oregon.

With respect,

Angela Ross, ND
Executive Director

February 6, 2024 **Sent via email**

Oregon Board of Naturopathic Medicine
800 NE Oregon Street, Ste 407
Portland, OR 97232
marybeth.baptista@obnm.oregon.gov

Re: Proposed Changes to Rule 850-040-0215

Dear Members of the Board:

On behalf of the Council on Naturopathic Medicine (CNME), the U.S. Department of Education-recognized accrediting agency for doctoral programs in naturopathic medicine (ND programs), I am writing to submit the following comments for consideration regarding proposed changes to the continuing education rule for Oregon NDs, namely Rule 850-040-0215 ("Approved accreditation services, providers and agencies, entities eligible for program approval").

Under the proposed rule change, the Council on Naturopathic Medical Education is apparently listed as an "approved accreditation service" or "approved accreditation agency" in regard to continuing education courses and programs for NDs. Please be aware that the CNME does not review and approve ***individual*** CE courses and programs. Rather, the CNME has an accreditation standard—Standard XI—that applies to CNME-accredited ND programs and their sponsoring institutions if they ***choose*** to offer ND program-related continuing education courses. Attached, FYI, is a copy of Standard XI.

If it is the Oregon Board of Naturopathic Medicine's intent to include the CNME as an approved accreditation agency for CE courses, you may want to consider stating something along the following lines in the revised rule: "Continuing medical education courses and programs sponsored by higher education institutions that offer CNME-accredited ND programs are automatically approved."

Please feel free to contact me if you have any questions or would like additional information. Thank you for considering the Council's input on the proposed rule changes.

Sincerely,



Daniel Seitz, JD, EdD
Executive Director

Attachment

CNME Standard XI: Continuing Medical Education

An institution or a naturopathic medical program that offers or sponsors continuing education courses or programs related to naturopathic medicine must have in place an administrative structure that maintains academic control over the courses or programs in order to ensure appropriateness, quality and consistency. For all continuing education courses and programs, the institution shall ensure that:

1. Courses and programs are well-designed and of good quality.
2. Instructors have appropriate qualifications to teach the course or program;
3. Any conflict of interest on the part of the instructor or course sponsor is publicized;
4. Accurate records of attendance, grades and other relevant information are maintained;
5. Programs are evaluated by attendees and program administrators;
6. The naturopathic medicine program does not allow students to take continuing education courses or programs as part of the core curriculum; however, programs may allow students to take continuing education courses or programs for elective credit within the naturopathic medicine program provided that the academic requirements and rigor are consistent with courses offered as part of the core curriculum; and
7. No certificate or other credential signifying completion of a continuing education course or program is issued prior to actual completion of all requirements.