

CRUMPLER Robin * OBNM

From: Cynthia P Buxton <rickcindi@gmail.com>
Sent: Monday, June 1, 2026 1:34 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: OBNM Proposed Draft Rules/Public Comment

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

Robin,

Thank you for informing me and for the hard work of updating all of these rules. I hope it goes smoothly for you all at OBNM.

Cindi Buxton, ND, LAc

On Mon, Jun 1, 2026 at 11:36 AM MEDICINE Naturopathic * OBNM
<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

OBNM Proposed Draft Rules/Public Comment

Last day and time to offer comment 6/21/2026 @ 8am

Submit public comment to: naturopathic.medicine@obnm.oregon.gov

The Board will be discussing the draft rules on June 15, bi-monthly [Board meeting](#).

[Oregon Board of Naturopathic Medicine: Board Meetings/Minutes: State of Oregon](#)

QUESTIONS & ANSWERS: REGARDING THE DRAFT ADMINISTRATIVE RULES.

QUESTION: Oregon Revised Statutes (ORS) - Oregon Administrative Rules (OAR) and the Divisions of OARs... What does all of that even mean? Why are they “organized” the way they are?

ANSWER: Here's how it works, Oregon Revised Statutes (ORS) are passed by the legislature, and are written purposefully broad. Oregon Administrative Rules Chapter 850, passed by the Naturopathic Board, fills in the gaps of the broad statutory language to provide clear and transparent expectations. Each Division of Chapter 850 – regulates a specific area; e.g. licensure rules / CE rules / general practice rules / discipline rules... etc.

PLEASE NOTE: The Board CAN NOT pass rules that go beyond the authority given to the Board in Statute. As you know, the Board changed ORS 685.110 Grounds for discipline; penalties in the 2025-2027 legislative session. The changes to ORS 685.110 added grounds for discipline related engaging in sexual conduct, ethical grounds / honesty in dealings with the Board, and enhanced transparency related to the practice of naturopathic medicine and licensee credentials. These rules DO NOT / CAN NOT impose new or additional grounds for discipline. **The proposed rules provide clarity and guidance to the BOARD's CURRENT AUTHORITY UNDER THE ADOPTED STATUTE 685.110.**

CRUMPLER Robin * OBNM

From: Ryan Hofer <naturoryan@gmail.com>
Sent: Monday, June 1, 2026 1:26 PM
To: MEDICINE Naturopathic * OBNM
Subject: Public Comment on Proposed rules

Regarding Professional Designations,

"(4) No person holding an Oregon license may hold themselves out or convey to the public or patients they are a “certified naturopathic physician” without completion of an accreditation, certification or residency program. Licensees who have completed an accreditation, certification or residency program must specifically state the school or organization were earned as part of their credentials and designation."

This will create a lot of problems. A certification should not be combined with a protected title. The certification can simply be listed separately.

The second sentence has a typo so I don't understand it, but how does an accreditation or residency confer a certification?

Board rules should promote clarity. This rule allows poor professional communication that will increase confusion for the public, and within our professional community.

Thanks,
Ryan Hofer, ND