

CRUMPLER Robin * OBNM

From: aimee bonneval <aobonnev@gmail.com>
Sent: Monday, January 12, 2026 5:47 PM
To: MEDICINE Naturopathic * OBNM
Subject: Fee increase

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Given how extraordinary the increase is, I think it makes sense for the board to outline what specific service costs are increasing. Is it rent on their space, a new tool they opted to use without properly vetting it, raises for admin? 30% is a huge cost to my business, which employs quite a few providers and covers costs of these expenses.

Can you please provide more information about what the increased rate is paying for?

Sincerely,
A Concerned ND

CRUMPLER Robin * OBNM

From: Leigh Ann Chapman <leighann@sellwoodfamilymedicine.com>
Sent: Monday, January 12, 2026 10:55 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

Our Fees for license, malpractice, State association dues, DEA keep going up.
Our reimbursement by insurance companies does not.
This is a REAL discrepancy.

Can the OBNM somehow work with the Oregon Insurance board to ensure that insurance companies do not discriminate against our profession?

<https://sbs.naic.org/solar-web/pages/public/onlineComplaintForm/onlineComplaintForm.jsf?state=or&dswid=-8753>

On Mon, Jan 12, 2026 at 9:25 AM MEDICINE Naturopathic * OBNM
<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

Oregon Board of Naturopathic Medicine has submitted [Amend Rule 850-030-0035](#) which increases fees by approximately 28.5% to maintain a six-month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

As part of the budget discussions for the 25-27 biennium; Board budget analyst, LFO and CFO and the Board discussed whether the agency needed to raise fees in the 25-27 biennium to maintain a six-month contingency through the biennium. Based on the significant cuts the Board made to administrative costs, Department of Justice cost estimates based on actuals from the previous biennium, and a drastic cut in rent costs, we all agreed the agency did not need to raise fees in the 25-27 biennium.

However, due to increased costs that were not anticipated and accounted for in the 25-27 budget, the Board needs to raise fees to maintain a six-

month contingency through AY 2029. There was a significant increase in service costs that was not anticipated in the budget projections; specifically, Shared Financial Services costs went up 37% - an additional \$22,789. Additionally, IT costs will double beyond the projected amount because we learned after the legislative session that Thentia (the contracting agency for the Board database) went into receivership. To maintain the current contractor and/or transition to a new database provider, costs will increase from the anticipated \$25,000 to approximately \$50,000. Additionally, due to statutorily mandated salary increases, cost of living adjustments and PERS, the agency is looking at an approximately \$35,000 shortfall in those budget line items as well.

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

LAST DAY AND TIME TO OFFER COMMENT TO AGENCY:
01/21/2026 8:00 AM

Please submit public comment
to: naturopathic.medicine@obnm.oregon.gov

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

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Leigh Ann Chapman N.D.

www.SellwoodFamilyMedicine.com

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CRUMPLER Robin * OBNM

From: BAPTISTA Mary Beth * OBNM
Sent: Monday, January 12, 2026 4:39 PM
To: Rebecca Provorse
Cc: MEDICINE Naturopathic * OBNM
Subject: RE: proposed draft Amend Rule 850-030-0035

I am so happy to hear both! That you knew we tried – but most especially that you read our notices!! I know this – to put it plainly – sucks! But even with (or most importantly with) bad news, I really try to make sure that everyone has as much information as possible to understand why we do what we (have to) do.

Also – as a public servant, doing the public’s business – I am very thankful you took the time to comment and give us your two cents! It’s your right!! I’m thankful you exercised it! Never hesitate to contact me / the Board with any questions.

Best, Mary-Beth

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

From: Rebecca Provorse <drprovorse@vervehealthcare.net>
Sent: Monday, January 12, 2026 4:14 PM
To: BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov>
Subject: Re: proposed draft Amend Rule 850-030-0035

I figured you guys had given it every effort. Just thought I'd offer my 2 cents and let you know someone is reading your messages. ;-)

Rebecca Provorse ND, LAc
www.vervehealthcareconsulting.com

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From: BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov>
Sent: Monday, January 12, 2026 11:06 AM
To: Rebecca Provorse <drprovorse@vervehealthcare.net>
Cc: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: FW: proposed draft Amend Rule 850-030-0035

Dr. Provorse,

I hear you. I understand your frustration. I/the Board cut every cost we could to avoid raising fees.

The Board of Naturopathic Medicine is a government agency that is operated solely by licensure fees and civil penalties – we do not get any other funds from the State government. However, the State legislature passes laws that require agencies to fund cost of living increases, salary increases, PERS offsets etc. for employees, without providing the agencies with funding to fulfill those mandates.

Unfunded mandates have been a huge issue for all small boards and commissions with small licensee bases that are the sole funding source. Compounding the problem, larger state agencies that we are required to use and pay fees for their services (like Shared Financial Services / Department of Administrative Services/ Department of Justice) have raised their fees to account for the same unfunded

mandates. Meaning – small boards like OBNM are squeezed from both ends.

Additionally – the Board is required to use approved providers for database / IT needs, and we had no control – or immediate options, to absorb the doubling in costs for Thentia's services (TRUST ME – I TRIED!!)

Finally – the Board is required by the legislature to maintain an approx. six-month contingency, and we had no choice but to raise fees to meet our financial obligations.

Please note – I made every effort to raise fees only minimally for applicants and new licensees, understanding the need for - as well as wanting to encourage – not discourage, students to apply for and be licensed in Oregon.

I appreciate your response. I am truly sorry for having to do this – but know we cut everything we could – and in the end – there was no other option.

I will forward your comments to the Board. Please let me know if you have any further questions.

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

From: Rebecca Provorse <drprovorse@vervehealthcare.net>
Sent: Monday, January 12, 2026 9:26 AM

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

Subject: re: proposed draft Amend Rule 850-030-0035

Ouch. 28.5% is an awfully steep raise to licensing fees.

I have read the proposal and your explanation of need for increased fees. I appreciate that there are expenses that were not anticipated and that fees must be raised. And though while fees may not have been raised this most recent biennium, it seems that I am paying so much more each year for each state in which I am licensed.

IF there is any other way to offset these costs (sponsorships, etc) that would be greatly appreciated. I don't have any ideas, but just wanted to offer my words of discouragement at having to pay such a steep increase in the near future.

Thank you and I appreciate your continued hard work for our organization.

Best,
Rebecca Provorse ND (OR lic 1375)

www.vervehealthcareconsulting.com

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From: BAPTISTA Mary Beth * OBNM
Sent: Monday, January 12, 2026 4:36 PM
To: Deborah McKay
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Fee Increase Proposal - Please compare with similar professions
Attachments: OR Proposed Increases - Comparable Jurisdictions 11.24.25.xlsx

Hello Dr. McKay

Thank you for your message. I hear you. I understand your frustration. I/the Board cut every cost we could to avoid raising fees.

I do not have the numbers you request at the ready. All that information should be posted on the respective Board websites.

I attached a spreadsheet comparing the proposed fee increases in Oregon to naturopathic licensure fees for Arizona, Washington, and California.

Here is some additional information related to the need for the fee increases.

The Board of Naturopathic Medicine is a government agency that is operated solely by licensure fees and civil penalties – we do not get any other funds from the State government. However, the State legislature passes laws that require agencies to fund cost of living increases, salary increases, PERS offsets etc. for employees, without providing the agencies with funding to fulfill those mandates.

Unfunded mandates have been a huge issue for all small boards and commissions with small licensee base that is the sole funding source. Compounding the problem, larger state agencies that we are required to use and pay fees for their services (like Shared Financial Services / Department of Administrative Services/ Department of Justice) have raised their fees to account for the same unfunded

mandates. Meaning – small boards like OBNM are squeezed from both ends.

Additionally – the Board is required to use approved providers for database / IT needs, and we had no control – or immediate options, to absorb the doubling in costs for Thentia's services (TRUST ME – I TRIED!!)

Finally – the Board is required by the legislature to maintain an approx. six-month contingency, and we had no choice but to raise fees to meet our financial obligations.

Please note – I/the Board made every effort to raise fees only minimally for applicants and new licensees, understanding the need for - as well as wanting to encourage – not discourage, students to apply for and be licensed in Oregon.

I appreciate your response. I am truly sorry for having to do this – but know we cut everything we could – and in the end – there was no other option.

I will forward your comments to the Board. Please let me know if you have any further questions.

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

From: Deborah McKay <drdebmckay@icloud.com>
Sent: Monday, January 12, 2026 2:54 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Fee Increase Proposal - Please compare with similar professions

First of all, I greatly appreciate OBNM and all it does to foster my beloved profession!

Regarding this shocking fee increase proposal:

- What are the fees for Oregon MD's?
- Or for Oregon Nurse Practitioners?
- Or for Oregon Physician Assistants?
- Or for Oregon Acupuncturists?
- Or for Oregon Dentists?

And for context regarding these comparisons,

- What are average annual incomes for Oregon ND's?
- for Oregon MD's?
- for Oregon Nurse Practitioners?
- for Oregon Physician Assistants?
- for Oregon Acupuncturists?
- for Oregon Dentists?

With no solid data to back me, I just have a strong feeling that our fees (as ND's) are disproportionately burdensome in light of our typical earnings.

If you want ND's to stay in business — which I believe is part of OBNM's mission, is it not? — then finding alternative funding sources would make sense.

I'm no budget geek, so I don't know what other funds to tap. But **let's try to keep "fairness," "equitability," and "preservation of this beleaguered profession" in the forefront here.**

Thank you for your consideration.
Sincerely,

Deb McKay, ND, FABNE
Portlandia

CRUMPLER Robin * OBNM

From: Carol McIntyre <cccmnd@yahoo.com>
Sent: Monday, January 12, 2026 9:59 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

While I understand the reasons for the fee increases, I do question whether additional funds could be found/recovered by possibly finding a different IT provider, as this cost is doubling alone. Also, it would be helpful to me if you could give example of how exactly this will impact us as members (ie. license fees, CE costs, membership fees etc... if applicable) in a dollar/cents amount rather than percentage, as you did in the email when describing cost increases (again with the IT example of \$25,000 to \$50,000). Overall, getting a better picture of what 28.5% looks like as out of pocket cost to us and individuals and potential ways to also just see if we can find a little extra \$\$ somewhere else to lower that % of increase a bit~

Thank you for all your very hard work.

Dr. C

Be Well~

Carol McIntyre, ND, MSOM, LAc.
Natural Path Health Services
843 Madison Ave
Vernonia OR 97064
P: 503-429-3928
F: 888-977-1763

On Monday, January 12, 2026 at 09:27:38 AM PST, MEDICINE Naturopathic * OBNM
<naturopathic.medicine@obnm.oregon.gov> wrote:

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LAST DAY AND TIME TO OFFER COMMENT TO AGENCY: 01/21/2026
8:00 AM

Please submit public comment
to: naturopathic.medicine@obnm.oregon.gov

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

CRUMPLER Robin * OBNM

From: BAPTISTA Mary Beth * OBNM
Sent: Monday, January 12, 2026 4:36 PM
To: Jenny Maurer
Cc: MEDICINE Naturopathic * OBNM
Subject: RE: FW: Proposed rule ammendment fee increase

Thank you for your response. The Board will review every public comment before voting to finalize the rule. As with all things – they need to balance licensee needs / feedback and the needs of the regulatory agency.

We are a public agency, and it is a public process – so its not a formality, it is the law and your right to comment. But I don't disagree that raising fees is an unavoidable necessity to maintain our current regulatory agency structure.

Please let me know if you have any further questions / comments. I will forward this email exchange to the Board for their review.

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

From: Jenny Maurer <jenny@sellwoodfamilymedicine.com>
Sent: Monday, January 12, 2026 12:44 PM
To: BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov>
Subject: Re: FW: Proposed rule ammendment fee increase

Thank you for your response. So it seems like this is a done deal then, that the public input period is just a requirement you have to offer, but in the end, it won't matter at all as the decision sounds like it has been made, am I correct? I understand budget shortfalls, everyone experiences them. If the state is mandating all these things, it seems reasonable they could also mandate pay parity but I guess that will never happen. I've pretty much resigned to this fact.

Again, I understand your position, I just wish it wasn't posed as taking public input on this when it's already been decided. A 37% fee increase is a significant amount to levy. Its not like we are making any more money.

On Mon, Jan 12, 2026 at 10:57 AM BAPTISTA Mary Beth * OBNM <MaryBeth.Baptista@obnm.oregon.gov> wrote:

Hello Dr. Maurer

I hear you. I understand your frustration. I/the Board cut every cost we could to avoid raising fees.

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Additionally – the Board is required to use approved providers for database / IT needs, and we had no control – or immediate options, to

absorb the doubling in costs for Thentia's services (TRUST ME – I TRIED!!)

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I appreciate your response. I am truly sorry for having to do this – but know we cut everything we could – and in the end – there was no other option.

I will forward your comments to the Board. Please let me know if you have any further questions.

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

From: Jenny Maurer <jenny@sellwoodfamilymedicine.com>
Sent: Monday, January 12, 2026 10:04 AM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: Proposed rule ammendment fee increase

Hello

I am writing in opposition to yet another fee increase for ND's. As everyone at the board gets cost of living raises and required raises and pension and we in the trenches scrape by, it is entirely unfair for us to have to foot the bill. We are already barely getting by as it is. Insurance does not give us raises to help with IT, cost of living, retirement, and of course, there is no requirement for them to do so. I am so tired of not making what I am worth, without pay parity we will never make any real money, students will never be able to pay their horrendous debt off and we will never be able to advance our profession. Many of us are strongly considering leaving the profession which will result in even less money in fees. Please consider how tough it is for us before raising out fees even more.

--

Jennifer Maurer, ND

Naturopathic Physician

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Jennifer Maurer, ND
Naturopathic Physician

~~~~~

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CRUMPLER Robin * OBNM

From: Kimberly Foster N.D. <kimfoster@oregonnaturopathicclinic.com>
Sent: Tuesday, January 13, 2026 4:39 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

Addendum:

And from the additional response to questions we just received (Bullet Point Answers to FAQs in public comment), it sounds like it's connected to the state of Oregon government system being bureaucratic and bloated too.

Our profession is sinking. Factors I'm aware of to support this statement include (and I'm sure there's more):1. Insurance reimbursement not keeping up / being cut entirely 2. Threat of losing professional status and access to student loans for new students trying to enter the profession 3. Student enrollment sinking and Basti campus on sale (I'm not sure of the status of the other schools). We can't afford this and it's really sad.

I realize the purpose of the OBNM is to protect the public and not necessarily to support the profession, but if we have no profession (because the economics don't work) bye bye board and bye bye to the valuable service of naturopathic medicine for the people of Oregon.

Kimberly Foster N.D.

Naturopathic Physician at Oregon Naturopathic Clinic

www.oregonnaturopathicclinic.com

<http://www.linkedin.com/in/kimberlyfosternaturopath>

“Dedicated to improving your health and well-being the natural way so you can live the highest quality life possible”

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On Mon, Jan 12, 2026 at 1:39 PM Kimberly Foster N.D. <kimfoster@oregonnaturopathicclinic.com> wrote:

Public comment:

The agency seems bloated to me and I have not been happy with the services I've received for the last several years. This is a huge increase and not warranted in my opinion. Our profession is already struggling enough, we don't need this.

Kimberly Foster N.D.

Naturopathic Physician at Oregon Naturopathic Clinic

www.oregonnaturopathicclinic.com

<http://www.linkedin.com/in/kimberlyfosternaturopath>

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----- Forwarded message -----

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

Date: Mon, Jan 12, 2026 at 9:27 AM

Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

To:

Oregon Board of Naturopathic Medicine has submitted [Amend Rule 850-030-0035](#) which increases fees by approximately 28.5% to maintain a six-month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

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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

CRUMPLER Robin * OBNM

From: Jessica Evans Ritz <jessica.evans.nd@gmail.com>
Sent: Tuesday, January 13, 2026 8:00 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

I just want to stop and thank you for all that you do.

I understand that I don't actually understand ALL that you do. And I appreciate that I don't have to know... I'm thankful that you are taking care of it.

As a private business owner, I am also aware that there are expenses and mandates that increase costs that are not as obvious as my raising my fees = my making more money. It's not that easy, but assumptions are easy to come by.

In a current economy where we are all feeling squeezed and less rewarded by the vice, I simply wanted to extend my sympathy and gratitude.

I'm happy to pay you an increased fee for my licensure in 2026.

Dr. Jessica M Evans, ND

One Space Health Care, LLC
1677 SE Spokane St
Portland, OR 97202

P) 503-675-2439
F) 503-210-0913
www.onespacehealthcare.com

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On Tue, Jan 13, 2026 at 4:08 PM MEDICINE Naturopathic * OBNM
<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

Good afternoon,

I appreciate your public comments. I hear you and I understand your frustration. Based on your feedback please see the **following answers to the frequently asked questions regarding the fee increase proposal:**

- *Why does the agency have to raise licensure fees, why can't they balance the budget using other funds?*
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Thank you.

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

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

Sent: Monday, January 12, 2026 9:29 AM

Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

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month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

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01/21/2026 8:00 AM

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971/673-0193

CRUMPLER Robin * OBNM

From: Lindsay Donahue <lindsay.koestner@gmail.com>
Sent: Tuesday, January 13, 2026 7:44 PM
To: MEDICINE Naturopathic * OBNM

Concerning the fee increase for inactive Oregon license. I, and I assume others who hold inactive licenses never plan to return to Oregon to practice. \$190 or \$200 is a bit, but not enough to discontinue holding the inactive license. If the fee increases above \$200, I honestly will save myself some money and let Oregon lapse. My Oregon license is doing nothing for me right now and hasn't for 13 years. It is basically a donation to Oregon. I almost let it lapse a couple years ago.

Please take this into consideration. I already am keeping an active Washington and Idaho ND license which are expensive enough, with the fee increase to \$260, I plan to stop keeping the inactive Oregon license and let it lapse and save myself some money.

Maybe before making inactive license fees increase, see if you will only lose those of us in my position. It's better to get \$200 than zero, just food for thought.

Sincerely,
Lindsay Donahue

CRUMPLER Robin * OBNM

From: BAPTISTA Mary Beth * OBNM
Sent: Tuesday, January 13, 2026 6:18 PM
To: Ryan Hofer; MEDICINE Naturopathic * OBNM
Subject: RE: fee increase and jurisprudence exam

Thank you for your feedback. We moved to a remote exam during the pandemic/lock down. We continued to administer it remotely because of the significant cost savings. We looked at employing professional exam services, but they were cost prohibitive.

I welcome any suggestions you may have, especially as a recent examinee, related to how to improve the experience.

Please email me your thoughts directly. Thank you!

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

From: Ryan Hofer <naturoryan@gmail.com>
Sent: Tuesday, January 13, 2026 4:40 PM
To: MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov>
Subject: fee increase and jurisprudence exam

Greetings,

I see the jurisprudence exam fee is being raised to \$250. Since I recently took the exam, it's fresh in my mind. I need to tell you, the exam experience does not feel professional or regulatory. It feels haphazard and cobbled together. Paying \$250 for an emailed pdf is a terrible first impression to give applicants, and the test content feels like a legal trivia game. The test is high stakes, and needs to feel

organized and professional. In fact, it would be far better for OBNM to utilize educational modules with online quizzes for the jurisprudence content.

Thanks,
Ryan Hofer

CRUMPLER Robin * OBNM

From: Chris Chlebowski <chrischlebowski@yahoo.com>
Sent: Tuesday, January 13, 2026 8:08 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Hello,

Thank you for the clarification on these questions. One other thought, how about dramatically raising the fees for civil penalties? Certainly it would not meet the entire budgetary needs but would perhaps allow for a slightly smaller increase?

Thank you for all of your hard work.

Dr. Chris Chlebowski

Dr. Chris Chlebowski
Author of The Virus and the Host

"THE VIRUS AND THE HOST is a practical and empowering guide to developing resilience against viral infections . . . from a sympathetic and supportive guide."—Dr Mark Hyman.

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On Tuesday, January 13, 2026 at 04:08:52 PM PST, MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov> wrote:

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Thank you.

In Health.

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

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800 NE Oregon Street, Suite 407

Portland OR 97232

971/673-0193

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CRUMPLER Robin * OBNM

From: Susan DeLaney <drdelaneynd@gmail.com>
Sent: Tuesday, January 13, 2026 4:58 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Dear Mary Beth,

Thanks for this informative email about the Board. I do hope that you are not getting too many complaints about raising our fees. In the big scheme of things it is not much to complain about!!! You folks do a great job and most of us are very grateful for the work that you do!

Many thanks,
Susan

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<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

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The Wellness Alliance

301 W. Weaver St.

Carrboro, NC 27510

919-932-6262

www.thewellnessalliance.com

CRUMPLER Robin * OBNM

From: Eric Mallory <epmallory@gmail.com>
Sent: Tuesday, January 13, 2026 10:38 AM
To: MEDICINE Naturopathic * OBNM
Subject: We could pay a temporary fee...Cost divided by number of licensees...maybe each of us could pay in June...

Eric Mallory #3079

CRUMPLER Robin * OBNM

From: daniel hardt <deltahardt@gmail.com>
Sent: Tuesday, January 13, 2026 6:43 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thankyou Ms MaryBeth.
For a job very well done.
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1. The Oregon State Government implemented a cost-of-living adjustment, and a step increase (i.e. salary increase) for all government employees. The legislature also set new employer contribution rates for PERS beginning in July 2025. **These adjustments / increases / contributions are mandated by law; they are not optional.** The State Government does not subsidize or fund these mandates or OBNM, **these unfunded mandates / cost increases are paid entirely by OBNM funds.**

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3. *What are the services we paying a 37% increase for? Why are we paying double for the database, isn't there a cheaper alternative than \$50,000?*

1. Service costs are approximately 25% of the Board's budget. OBNM is **required to use state agencies for business matters** – e.g. Shared Financial Services / Department of Administrative Services / Department of Justice. These costs include government service charges/professional services, including but not limited to - pay roll, invoicing / bill payments, budget/financial analysts, insurance costs; IT/telecommunication - data processing, IT professional services; legal fees. These agencies raised

their fees to account for the same unfunded mandates referenced above, as well as inflation. This means that small boards and commissions with a small licensee base, like **OBNM, are squeezed from both ends – paying for our unfunded mandates/inflation and paying increased rates these agencies imposed / passed on to their customers to cover their increased costs.**

1. Of note – I worked diligently with the Dept. of Admin services to reduce rent costs by 81% - saving \$45,000 over the next biennium.
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4. *What does a 28.5% fee increase look like in dollars and cents?*

1. The changes to the **fee schedule is linked in draft rule below / posted again here: [Amend Rule 850-030-0035](#)**

1. Active Licensure Renewal: current \$400 / proposed \$515
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5. *Didn't the Board just raise fees? Are Oregon's fees disproportionate with other jurisdictions?*

1. **In August 2023, the Board raised active / prorated / inactive licensure fees, and the jurisprudence exam fee by \$50**; annual active licensure went from \$350 to \$400, inactive licensure renewal fee from \$140 to \$190, prorated licensure fees by \$50, jurisprudence examination fee from \$150 to \$200 and established a licensure application processing fee of \$50. **The agency previously raised active / prorated / inactive licensure fees by \$50 on July 1, 2020.**

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/ licensees through Oregon Revised Statutes and Administrative Rules. Simply put, we do not have jurisdiction regarding insurance business practices.

Please know, **I/the Board did not want it to come to this, we cut every cost we could to avoid raising fees.** Unfortunately, due to inflation, unfunded mandates, significant increases in costs completely outside of our control, we ran out of options.

Please continue to send us your questions and public comments through January 21, at 8am.

Thank you.

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

From: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Sent: Monday, January 12, 2026 9:29 AM
Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

Oregon Board of Naturopathic Medicine has submitted [Amend Rule 850-030-0035](#) which increases fees by approximately 28.5% to maintain a six-month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

As part of the budget discussions for the 25-27 biennium; Board budget analyst, LFO and CFO and the Board discussed whether the agency needed to raise fees in the 25-27 biennium to maintain a six-month contingency through the biennium. Based on the significant cuts the Board made to administrative costs, Department of Justice cost estimates based on actuals from the previous biennium, and a drastic cut in rent costs, we all agreed the agency did not need to raise fees in the 25-27 biennium.

However, due to increased costs that were not anticipated and accounted for in the 25-27 budget, the Board needs to raise fees to maintain a six-month contingency through AY 2029. There was a significant increase in service costs that was not anticipated in the budget projections; specifically, Shared Financial Services costs went up 37% - an additional \$22,789. Additionally, IT costs will double beyond the projected amount because we learned after the legislative session that Thentia (the contracting agency for the Board database) went into receivership. To maintain the current contractor and/or transition to a new database provider, costs will increase from the anticipated \$25,000 to approximately \$50,000. Additionally, due to statutorily mandated salary increases, cost of living adjustments and PERS, the agency is looking at an approximately \$35,000 shortfall in those budget line items as well.

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

LAST DAY AND TIME TO OFFER COMMENT TO

AGENCY: 01/21/2026 8:00 AM

Please submit public comment

to: naturopathic.medicine@obnm.oregon.gov

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

<OR Proposed Increases - Comparable Jurisdictions 11.24.25.pdf>

CRUMPLER Robin * OBNM

From: Dr. Natasha Kassam <drnkassam@gmail.com>
Sent: Tuesday, January 13, 2026 4:36 PM
To: MEDICINE Naturopathic * OBNM
Subject: Public Comment on Proposed Fee Increase_Appreciation and Context

Good afternoon, Mary-Beth and OBNM team,

I am writing to offer a brief note of appreciation in response to the detailed explanation you shared regarding the proposed fee increase.

I recognize from your communication that this decision was not made lightly and that substantial effort was made to exhaust every other option before arriving here. I can hear the diligence, transparency, and constraint under which the Board is operating, as well as the weight of navigating statutory mandates, inflationary pressures, and rising service costs that are primarily outside of your control.

As a practicing naturopathic physician, I also want to acknowledge how difficult it must be to continually receive the understandable frustration of licensees who are themselves under significant financial and professional strain. Many of us are working hard for pay parity, sustainability, and long-term viability in a healthcare system that does not yet adequately value our work. Holding that tension from both sides is no small task.

Thank you for the often unseen and underrecognized labor involved in keeping the Board functioning with integrity, fiscal responsibility, and adherence to legislative requirements. While this moment is challenging for the profession as a whole, I appreciate the clarity and respect with which you have communicated the constraints and realities facing the agency.

With gratitude for your continued service and stewardship,

Warmly,
Dr. Natasha Kassam

CRUMPLER Robin * OBNM

From: Angela Carter <angie.carter7@gmail.com>
Sent: Tuesday, January 13, 2026 4:49 PM
To: MEDICINE Naturopathic * OBNM
Subject: Proposed fee increases

I'm so sorry y'all are feeling the squeeze so hard and being attacked for that which you have no control over whatsoever. We faced the same financial problems with the Oregon Psilocybin Program. I just wanted to say thank you for everything you all do and how hard you work for us, and I hope you get some positive regard for what you've accomplished.

It's unlikely I will be able to practice medicine again, but I'll keep my inactive license up for hope anyway, and I for one am happy to pay the increased fees.

Take care of yourselves,



Angela M Carter, ND
Pronouns: they/them

*You have to act as if it were possible to radically transform the world. And you have to do it all the time. -
[Angela Yvonne Davis](#)*

CRUMPLER Robin * OBNM

From: Carmen <carmenripley@gmail.com>
Sent: Tuesday, January 13, 2026 4:36 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Dear OBNM,

I am writing regarding the recent notice of another licensing fee increase.

I have held my ND license since 1999 and practiced through March of 2012. For the past 13 years, I have maintained my license in inactive status. With the new increase bringing the cost to \$260 annually, maintaining an *inactive* license has become unreasonable.

I find it concerning and very disappointing that inactive license fees continue to rise to a level that effectively discourages long-term connection to the profession! For inactive licensees, the privileges and administrative burden are minimal, yet the financial impact is significant. I had planned to maintain my inactive license status until I could transition to retirement status, but requiring practitioners to wait until age 70 to access the retirement option feels unnecessarily restrictive and out of step with the realities of long-term professional careers and now unaffordable.

This increase follows a significant licensure fee adjustment in 2023, making the cumulative cost especially difficult to justify. As a result, I will not be renewing my inactive license next year. I wanted to communicate clearly that this decision is based solely on the cost of maintaining an inactive license, which at this level feels misaligned with the profession's stated values!

Thank you for your time.

Sincerely,
Carmen Ripley, ND

On Tue, Jan 13, 2026 at 4:10 PM MEDICINE Naturopathic * OBNM
<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

Good afternoon,

I appreciate your public comments. I hear you and I understand your frustration. Based on your feedback please see the **following answers to the frequently asked questions regarding the fee increase proposal:**

- *Why does the agency have to raise licensure fees, why can't they balance the budget using other funds?*
 - **There are no other funds.** The Board of Naturopathic Medicine is a regulatory agency that is funded solely by licensure fees (89% of total income) and civil penalties from discipline— we **do not get any funds from the State Government.** The agency is **entirely self-funding** and **the only way to raise funds to meet our budget obligations is through increase in licensure fees.** Board is required by the legislature to maintain an approximately six-month contingency balance.
- *Why are we paying for the Board staff and members to get salary increases, cost of living adjustments and supplement PERS (retirement)?*
 - The Oregon State Government implemented a cost-of-living adjustment, and a step increase (i.e. salary increase) for all government employees. The legislature also set new employer contribution rates for PERS beginning in July 2025. **These adjustments / increases / contributions are mandated by law; they are not optional.** The State Government does not subsidize or fund these mandates or OBNM, **these unfunded mandates / cost increases are paid entirely by OBNM funds.**

- **Board members are not receiving the cost-of-living adjustments or a pay increase.** In fact, **I cut the Board member stipends drastically, to the limit allowed by law.**

- *What are the services we paying a 37% increase for? Why are we paying double for the database, isn't there a cheaper alternative than \$50,000?*

- Service costs are approximately 25% of the Board's budget. OBNM is **required to use state agencies for business matters** – e.g. Shared Financial Services / Department of Administrative Services / Department of Justice. These costs include government service charges/professional services, including but not limited to - pay roll, invoicing / bill payments, budget/financial analysts, insurance costs; IT/telecommunication - data processing, IT professional services; legal fees. These agencies raised their fees to account for the same unfunded mandates referenced above, as well as inflation. This means that small boards and commissions with a small licensee base, like **OBNM, are squeezed from both ends – paying for our unfunded mandates/inflation and paying increased rates these agencies imposed / passed on to their customers to cover their increased costs.**
 - Of note – I worked diligently with the Dept. of Admin services to reduce rent costs by 81% - saving \$45,000 over the next biennium.

- The Board is **required to use approved providers for database / IT** needs, and we had **no control – or immediate**

options, to absorb the doubling in costs for Thentia's (database) services.

- *What does a 28.5% fee increase look like in dollars and cents?*
- The changes to the **fee schedule is linked in draft rule below / posted again here: [Amend Rule 850-030-0035](#)**
 - Active Licensure Renewal: current \$400 / proposed \$515
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- *Didn't the Board just raise fees? Are Oregon's fees disproportionate with other jurisdictions?*
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Please know, **I/the Board did not want it to come to this, we cut every cost we could to avoid raising fees.** Unfortunately, due to inflation,

unfunded mandates, significant increases in costs completely outside of our control, we ran out of options.

Please continue to send us your questions and public comments through January 21, at 8am.

Thank you.

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

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

Sent: Monday, January 12, 2026 9:29 AM

Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

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

LAST DAY AND TIME TO OFFER COMMENT TO AGENCY:
01/21/2026 8:00 AM

Please submit public comment
to: naturopathic.medicine@obnm.oregon.gov

In Health.

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

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800 NE Oregon Street, Suite 407

Portland OR 97232

971/673-0193

CRUMPLER Robin * OBNM

From: Michelle Niesley <docmniesley@gmail.com>
Sent: Tuesday, January 13, 2026 7:37 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thanks Mary Beth.

I may be one of the few, but since I'm also running a business (in Kansas--reside in OR), I understand the steps that need to be taken to mitigate circumstances out of your control.

I appreciate the communication, and the work that OBNM continues to do.

Kind regards,

Michelle Niesley, ND, MS, FABNO

On Tue, Jan 13, 2026 at 4:05 PM MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

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> In Health.

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> Mary-Beth Baptista, J.D. (she / her)
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 > 800 NE Oregon Street, Suite 407
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> Mary-Beth Baptista, J.D. (she / her)

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> Executive Director - Oregon Board of Naturopathic Medicine

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Michelle Niesley, ND, MS, FABNO

Confidential Communication:

This email message and any attachments are intended only for the addressee. This email and any attachments may be privileged, confidential, and protected from disclosure. If you have received this message in error, you may not disseminate, distribute, or copy it or any attachments that accompany it. Please reply to this email to inform the sender of the error, then delete the message and any attachments from your system. E-mail transmission cannot be guaranteed to be secure or error-free, so it's best to leave anything you need to keep confidential to in-person appointments. If you have asked a question via email, it is assumed you accept these risks and would like a reply via email.

CRUMPLER Robin * OBNM

From: noel peterson <noelpeterson1@comcast.net>
Sent: Tuesday, January 13, 2026 5:37 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received
Attachments: OR Proposed Increases - Comparable Jurisdictions 11.24.25.pdf
Importance: High

Dear Board, and Executive Director:

I just wanted to let you know how much I appreciate your thorough response to our questions regarding the mandated fee increases.

Thank you again,

Dr. Noel Peterson

On Jan 13, 2026, at 4:08 PM, MEDICINE Naturopathic * OBNM
<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

Good afternoon,

I appreciate your public comments. I hear you and I understand your frustration. Based on your feedback please see the **following answers to the frequently asked questions regarding the fee increase proposal:**

- *Why does the agency have to raise licensure fees, why can't they balance the budget using other funds?*
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Please know, **I/the Board did not want it to come to this, we cut every cost we could to avoid raising fees.** Unfortunately, due to inflation, unfunded mandates, significant increases in costs completely outside of our control, we ran out of options.

Please continue to send us your questions and public comments through January 21, at 8am.

Thank you.

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

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

Sent: Monday, January 12, 2026 9:29 AM

Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

Oregon Board of Naturopathic Medicine has submitted [Amend Rule 850-030-0035](#) which increases fees by approximately 28.5% to maintain a six-month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

As part of the budget discussions for the 25-27 biennium; Board budget analyst, LFO and CFO and the Board discussed whether the agency needed to raise fees in the 25-27 biennium to maintain a six-month contingency through the biennium. Based on the significant cuts the Board made to administrative costs, Department of Justice cost estimates based on actuals from the previous biennium, and a drastic cut in rent costs, we all agreed the agency did not need to raise fees in the 25-27 biennium.

However, due to increased costs that were not anticipated and accounted for in the 25-27 budget, the Board needs to raise fees to maintain a six-month contingency through AY 2029. There was a significant increase in service costs that was not anticipated in the budget projections; specifically, Shared Financial Services costs went up 37% - an additional

\$22,789. Additionally, IT costs will double beyond the projected amount because we learned after the legislative session that Thentia (the contracting agency for the Board database) went into to receivership. To maintain the current contractor and/or transition to a new database provider, costs will increase from the anticipated \$25,000 to approximately \$50,000. Additionally, due to statutorily mandated salary increases, cost of living adjustments and PERS, the agency is looking at an approximately \$35,000 shortfall in those budget line items as well.

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

LAST DAY AND TIME TO OFFER COMMENT TO AGENCY:

01/21/2026 8:00 AM

Please submit public comment

to: naturopathic.medicine@obnm.oregon.gov

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

CRUMPLER Robin * OBNM

From: Main Office <etnaoffice@proton.me>
Sent: Tuesday, January 13, 2026 4:15 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Greetings,

I appreciate all that you and the OBNM staff do for the profession. Like any other business expense, I predict that OBNM costs to ensure that the practice of naturopathic medicine remains is high.

Happy New Year!

Thank you!

Noah D. Perlman, ND, DC, CFMP, FBCA

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On Tuesday, January 13th, 2026 at 4:10 PM, MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

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- *Why does the agency have to raise licensure fees, why can't they balance the budget using other funds?*

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Executive Director - Oregon Board of Naturopathic Medicine

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971/673-0193

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28.5% to maintain a six-month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

As part of the budget discussions for the 25-27 biennium; Board budget analyst, LFO and CFO and the Board discussed whether the agency needed to raise fees in the 25-27 biennium to maintain a six-month contingency through the biennium. Based on the significant cuts the Board made to administrative costs, Department of Justice cost estimates based on actuals from the previous biennium, and a drastic cut in rent costs, we all agreed the agency did not need to raise fees in the 25-27 biennium.

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to: naturopathic.medicine@obnm.oregon.gov

In Health.

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

Sent: Monday, January 12, 2026 9:29 AM

Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public
Comment through 1/21/2026.

From: rebecca.krisko@gmail.com
Sent: Tuesday, January 13, 2026 5:22 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thank you for the tireless work you do on behalf of our profession. You deserve to be paid and these fee increases are completely justified.

On Jan 13, 2026, at 4:07 PM, MEDICINE Naturopathic * OBNM
<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

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1. *Why does the agency have to raise licensure fees, why can't they balance the budget using other funds?*
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4. *What does a 28.5% fee increase look like in dollars and cents?*

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5. *Didn't the Board just raise fees? Are Oregon's fees disproportionate with other jurisdictions?*

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Executive Director - Oregon Board of Naturopathic Medicine
800 NE Oregon Street, Suite 407
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971/673-0193

From: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Sent: Monday, January 12, 2026 9:29 AM
Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

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Please submit 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

<OR Proposed Increases - Comparable Jurisdictions 11.24.25.pdf>

CRUMPLER Robin * OBNM

From: Andy Turner <dr.turner@andynd.com>
Sent: Tuesday, January 13, 2026 7:45 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thank you for the work you do! This is not an easy conversation and I appreciate the transparency

Andy Turner, ND

www.AndyND.com - Naturopathic Medicine for the whole family

Naturopathic Doctor at [Heart Spring Health](#) in Portland, OR

****THIS EMAIL IS CONFIDENTIAL****

This electronic message and attached files may contain information that is confidential information belonging to the sender and is protected by Oregon state and/or federal law. This information is solely for the use of the individuals and entities named as recipients in the message. You may be exposed to legal liability if you disclose this information to another person. You are obligated to maintain this information in a safe and secure manner. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or other use of the content of this electronic message is strictly prohibited. If you have received this electronic message in error, please notify the sender immediately by telephone to arrange for return of the documents to us. Thank you.

On Tue, Jan 13, 2026 at 4:08 PM MEDICINE Naturopathic * OBNM

<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

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Please continue to send us your questions and public comments through January 21, at 8am.

Thank you.

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

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

Sent: Monday, January 12, 2026 9:29 AM

Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

Oregon Board of Naturopathic Medicine has submitted [Amend Rule 850-030-0035](#) which increases fees by approximately 28.5% to maintain a six-month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

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

LAST DAY AND TIME TO OFFER COMMENT TO AGENCY:
01/21/2026 8:00 AM

Please submit public comment
to: naturopathic.medicine@obnm.oregon.gov

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

CRUMPLER Robin * OBNM

From: Shena Vander Ploeg <shena.vanderploeg@gmail.com>
Sent: Tuesday, January 13, 2026 6:24 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received
Attachments: OR Proposed Increases - Comparable Jurisdictions 11.24.25.pdf

This seems preposterous and unsustainable. It really needs a creative solution.

1. Where can we find the breakdown of this by line item including vendor and cost?

Who is costing legal fees for example?

What's kind of IT services?

Budget and financial analysts?

”

- Service costs are approximately 25% of the Board's budget. OBNM **is required to use state agencies for business matters** – e.g. Shared Financial Services / Department of Administrative Services / Department of Justice. These costs include government service charges/professional services, including but not limited to - pay roll, invoicing / bill payments, budget/financial analysts, insurance costs; IT/telecommunication - data processing, IT professional services; legal fees. These agencies raised their fees to account for the same unfunded mandates referenced above, as well as inflation. This means that small boards and commissions with a small licensee base, like **OBNM, are squeezed from both ends – paying for our unfunded mandates/inflation and paying increased rates these agencies imposed / passed on to their customers to cover their increased costs.** ”

2. Can you switch the database?

Thentia's (database) services. DOUBLING COST is insanity and they can do it again.

3. Seems like there should be some fund raising to support the board. What kind of budget adjustments besides 45k rent saved? What is the total cost of rent with a virtual board? Why doesn't OBNM autonomy in selecting platforms/services providers?

4. As an ND I've never been giving a cost of living adjusted wage.... Seems like the board is a little out of touch with how hard we work for our money.

Oregon should not be compared to California In my opinion— Arizona or Washington maybe based on income/cost of living/population.

The information contained in this transmission may contain privileged and confidential information, including patient information protected by federal and state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

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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

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800 NE Oregon Street, Suite 407

Portland OR 97232

971/673-0193

CRUMPLER Robin * OBNM

From: BAPTISTA Mary Beth * OBNM
Sent: Wednesday, January 14, 2026 12:20 PM
To: drkarineal@gmail.com
Cc: MEDICINE Naturopathic * OBNM
Subject: FW: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Please see my answers to your questions below.

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

From: Kari Neal <drkarineal@gmail.com>
Sent: Wednesday, January 14, 2026 10:31 AM
To: MEDICINE Naturopathic * OBNM <Naturopathic.MEDICINE@obnm.oregon.gov>
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Hello Mary-Beth,

I appreciate your helpful and thorough email of explanation, and for your diligent work for the OBNM. I have a couple questions.

1) How much will the proposed increase affect the annual license fee cost?

The draft rule is linked twice in the emails below – see “what does this cost in dollars and cents” below

2) My understanding is that the OBNM licensure allows NDs to be recognized to Dx and Tx as well as be paid by insurance and order Rx from pharmacies. Is this correct?

Licensed Oregon NDs are primary care physicians in Oregon and may prescribe all drugs on the AHFS unless excluded by rule – see: <https://www.oregon.gov/obnm/Pages/Statutes-and-Rules.aspx>

3) If an ND lets their ND License lapse, what is the required procedure to reinstate a license?

See: [850-030-0195](https://www.oregon.gov/obnm/Pages/Statutes-and-Rules.aspx) License Renewal and Change of Status Requirements

4) Do you believe there is an agenda in the government mandating increased costs, yet not offering subsidy? ... And, we likely wouldn't want gov. subsidy, right? Because then they can tell us what we have to do even more, like the AMA?

No. All health-related licensing boards are self-funded and not subsidized by the general fund. For instance, the Oregon Medical Board is also raising fees by approximately 20% due to increased costs. Also, the American Medical Association is not a government agency, and does not have any regulatory authority – it is an association funded by membership.

Thank you. May God bless you and your family,

Dr. Kari Neal

"I Can Do ALL Things Through Christ, Who Strengthens Me."
- Philippians 4:13

"Man Shall Not Live By Bread Alone, But By Every Word That Proceeds From The Mouth Of God." -
Matthew 4:4

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800 NE Oregon Street, Suite 407

Portland OR 97232

971/673-0193

From: Jakob Schmidt <jakob.j.schmidt@gmail.com>
Sent: Wednesday, January 14, 2026 8:59 AM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thank you, Mary-Beth,

Your transparency and thoroughness in these responses are very helpful. I'm truly grateful you took the time to put this together. I believe it's your job to do so and feel you have done so very well.

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Please continue to send us your questions and public comments through January 21, at 8am.

Thank you.

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

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

Sent: Monday, January 12, 2026 9:29 AM

Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

Oregon Board of Naturopathic Medicine has submitted [Amend Rule 850-030-0035](#) which increases fees by approximately 28.5% to maintain a six-month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

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However, due to increased costs that were not anticipated and accounted for in the 25-27 budget, the Board needs to raise fees to maintain a six-month contingency through AY 2029. There was a significant increase in service costs that was not anticipated in the budget projections; specifically, Shared Financial Services costs went up 37% - an additional

\$22,789. Additionally, IT costs will double beyond the projected amount because we learned after the legislative session that Thentia (the contracting agency for the Board database) went into receivership. To maintain the current contractor and/or transition to a new database provider, costs will increase from the anticipated \$25,000 to approximately \$50,000. Additionally, due to statutorily mandated salary increases, cost of living adjustments and PERS, the agency is looking at an approximately \$35,000 shortfall in those budget line items as well.

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

LAST DAY AND TIME TO OFFER COMMENT TO AGENCY:
01/21/2026 8:00 AM

Please submit public comment
to: naturopathic.medicine@obnm.oregon.gov

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

--

Godspeed

Jakob Schmidt, ND

CRUMPLER Robin * OBNM

From: Dr. Mazure-Mitchell <dr_mmm_nd@hotmail.com>
Sent: Wednesday, January 14, 2026 9:36 AM
To: MEDICINE Naturopathic * OBNM
Subject: License increase

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

The increase proposed is an outrageous amount! It is much more than the cost of living increase. Our Naturopathic profession already struggles with lack of pay parity and insurance companies dropping coverage.

\$25.00 is much more reasonable (which is close to ~5% vs ~25%)

You must reconsider.

Dr. Miriam Mazure-Mitchell, ND, MS
Engage Health Clinic
1310 Coburg Rd Suite 1
Eugene, OR 97401-5200
541-799-0070

CRUMPLER Robin * OBNM

From: Brenda McCool <drmccoolnd@gmail.com>
Sent: Wednesday, January 14, 2026 12:59 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thank you for this very comprehensive explanation.

I truly appreciate your efforts and dedication to our profession.

I am grateful that we have our own regulatory board and are not under OHA. This alone is worth way more than \$515 for our scope and license to practice.

With Gratitude,
Brenda McCool

On Tue, Jan 13, 2026 at 4:07 PM MEDICINE Naturopathic * OBNM
<Naturopathic.MEDICINE@obnm.oregon.gov> wrote:

Good afternoon,

I appreciate your public comments. I hear you and I understand your frustration. Based on your feedback please see the **following answers to the frequently asked questions regarding the fee increase proposal:**

- *Why does the agency have to raise licensure fees, why can't they balance the budget using other funds?*
 - **There are no other funds.** The Board of Naturopathic Medicine is a regulatory agency that is funded solely by licensure fees (89% of total income) and civil penalties from discipline— we **do not get any funds from the State Government.** The agency is **entirely self-funding** and **the**

only way to raise funds to meet our budget obligations is through increase in licensure fees. Board is required by the legislature to maintain an approximately six-month contingency balance.

- *Why are we paying for the Board staff and members to get salary increases, cost of living adjustments and supplement PERS (retirement)?*
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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



CRUMPLER Robin * OBNM

From: Deborah Frances <deborah.frances@yahoo.com>
Sent: Wednesday, January 14, 2026 11:15 AM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

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

Fees for what?

May Beauty Surround You,
Dancing Crow

New Book Out Now! - *Coming Home on the Wind*

Spirit is not separate from the mundane aspects of our lives. Our Divine Creator is infused through each moment and throughout all creation. What makes it seem otherwise is no more than an error of perception.

In *Coming Home on the Wind*, heartfelt encounters with animals, both wild and domestic, are interspersed with Earth-centered teachings to remind us that Earth and Spirit are not separate. Skunks, spiders, cats, coyotes, hummingbirds and others share their wisdom in this beautifully written book.

The power of herbs, homeopathy, spiritual healing and relationships are woven throughout the primary story of a gentle mare named Rosa and her high-spirited son Waku. The presence of Spirit coming through each animal encounter inspires the heart to reweave the broken web of interconnection.

[Purchase Coming Home on the Wind Here!](#)

On Monday, January 12, 2026 at 09:12:57 AM PST, MEDICINE Naturopathic * OBNM <naturopathic.medicine@obnm.oregon.gov> wrote:

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In Health.

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Executive Director - Oregon Board of Naturopathic Medicine

800 NE Oregon Street, Suite 407

Portland OR 97232

971/673-0193

CRUMPLER Robin * OBNM

From: WENDY R ABRAHAM <wrabrahimnd@yahoo.com>
Sent: Wednesday, January 14, 2026 6:39 AM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thank you for the info and transparency and all that you (and the Board) do!

Wendy Abraham

[Yahoo Mail: Search, Organize, Conquer](#)

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Thank you.

In Health.

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

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971/673-0193

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Portland OR 97232

971/673-0193

CRUMPLER Robin * OBNM

From: Cynthia P Buxton <rickcindi@gmail.com>
Sent: Tuesday, January 13, 2026 7:57 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

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

Hi Mary Beth,

I am very confused by this communication referring to me leaving public comments of frustration about you. I do not recall leaving any public comments of frustration regarding OBNM raising your fees. I am beyond leaving comments. I am currently working on moving out of the state and that is the focus of my efforts at this time. You mention that people are earning less and costs of living and working are up. You do realize that means us, too. I fully realize that making any comments would not make any difference, but thank you for clarifying OBNM's position. This positively motivates me further.

Cindi

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Thank you.

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

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

Sent: Monday, January 12, 2026 9:29 AM

Subject: Notice of Proposed Draft Rule - 850-030-0035 - Fee Increase - Open for Public Comment through 1/21/2026.

Oregon Board of Naturopathic Medicine has submitted [Amend Rule 850-030-0035](#) which increases fees by approximately 28.5% to maintain a six-month contingency through the 27-29 biennium. The fee schedule in the rule generates the income necessary to meet the 28.5% increase required.

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Portland OR 97232

971/673-0193

CRUMPLER Robin * OBNM

From: Kari Neal <drkarineal@gmail.com>
Sent: Wednesday, January 14, 2026 10:31 AM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Hello Mary-Beth,

I appreciate your helpful and thorough email of explanation, and for your diligent work for the OBNM. I have a couple questions.

- 1) How much will the proposed increase affect the annual license fee cost?
- 2) My understanding is that the OBNM licensure allows NDs to be recognized to Dx and Tx as well as be paid by insurance and order Rx from pharmacies. Is this correct?
- 3) If an ND lets their ND License lapse, what is the required procedure to reinstate a license?
- 4) Do you believe there is an agenda in the government mandating increased costs, yet not offering subsidy? ... And, we likely wouldn't want gov. subsidy, right? Because then they can tell us what we have to do even more, like the AMA?

Thank you. May God bless you and your family,

Dr. Kari Neal

**"I Can Do ALL Things Through Christ, Who Strengthens Me."
- Philippians 4:13**

**"Man Shall Not Live By Bread Alone, But By Every Word That Proceeds From The Mouth Of God." -
Matthew 4:4**

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- *What are the services we paying a 37% increase for? Why are we paying double for the database, isn't there a cheaper alternative than \$50,000?*

- Service costs are approximately 25% of the Board's budget. OBNM is **required to use state agencies for business matters** – e.g. Shared Financial Services / Department of Administrative Services / Department of Justice. These costs include government service charges/professional services, including but not limited to - pay roll, invoicing / bill payments, budget/financial analysts, insurance costs; IT/telecommunication - data processing, IT professional services; legal fees. These agencies raised their fees to account for the same unfunded mandates referenced above, as well as inflation. This means that small boards and commissions with a small licensee base, like **OBNM, are squeezed from both ends – paying for our unfunded mandates/inflation and paying increased rates these agencies imposed / passed on to their customers to cover their increased costs.**
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CRUMPLER Robin * OBNM

From: Erin Walker <erinwalker.nd@gmail.com>
Sent: Friday, January 16, 2026 7:47 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thank you for the advanced notice and explanation. PERS is expensive.
Happy New Year,
Erin Walker,ND

Sent from my iPhone

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800 NE Oregon Street, Suite 407
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971/673-0193

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<OR Proposed Increases - Comparable Jurisdictions 11.24.25.pdf>

CRUMPLER Robin * OBNM

From: Carol Petherbridge <drcarol@freedomregenmed.com>
Sent: Saturday, January 17, 2026 5:47 PM
To: MEDICINE Naturopathic * OBNM
Subject: Re: Fee Increase Draft Rule 850-030-0035 - Bullet Point Answers to FAQs in public comment / feed back received

Thank you for all your hard work!!
I appreciate it.

Dr. Carol Petherbridge

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