

Board of Naturopathic Medicine 800 NE Oregon, Suite 407 Portland, OR 97232-2187

Phone: 971-673-0193 www.oregon.gov/OBNM

Oregon Board of Naturopathic Medicine – Public Meeting Minutes

DATE / TIME: February 12, 2024, Public Session open approximately 1pm. Adjourn approximately 330pm.

LOCATION: 800 NE Oregon Street, Room 445, on the fourth floor Portland, OR; Zoom and Conference Call-in line.

PRESENT: Board Members: Board Chair Joana Freedman, PT, Bill Walter, ND; Meghan Larivee, ND, Ryan Martin, ND, Zia Robles-Hernandez, ND, Ryan Minarik, ND & Mary-Beth Baptista, Executive Director. No members of the media present.

ABSENT: Kate Watkinson Wright

<u>PUBLIC ATTENDEES:</u> Laura Farr, ED of AANP (in person). Dr. Timothy Miller via Zoom (left approximately 30m into the meeting discussion)

- 1. Approval of December 11, 2023, Executive and Public Meeting Minutes
- 2. Complaint / Investigation / Discipline Recommendations / Case Resolution Update.
 - (24-01-01) Notice of Denial of Licensure
 - (23-07-26) Amended Notice of Proposed Discipline Reprimand
 - (22-10-26) Board closure no discipline
 - (23-02-05) Board closure no discipline
 - (23-06-22) Board closure no discipline
 - (23-07-25) Notice of Proposed Discipline Negligent Tx X2 Ethical Violation x2
 - (23-07-27) Board closure no discipline
- 3. Director's Report:
 - Exec Appts February 6, 2024, Senate Confirmation of Josh Luper, DAc, LAc, BCSI
 - Board Retreat Scheduled/ Confirmed April 14-16, 2024 at McMenamins Hotel Oregon McMinnville
 - Budget document review
- 4. Discussion re: Public Comment / Dr. Timothy Miller CE submissions:

NaturopathicCE.com / Dr. Timothy Miller owner – submits approximately 30-50 CE approval applications each month – approximately 360-600 applications a year. The Board reviews roughly between 60-100 applications from Dr. Miller per meeting. The Board reviewed 118 applications from NaturopathicCE.com at the February Board meeting. The following data is based on OBNM 2023 CE reporting, cross referenced by data from Dr. Timothy Miller.

Oregon Licensees reported ONLY 30% of NatCE courses approved by the Board for required annual renewal. 70% of the NatCE courses approved by the Board were NOT reported for annual renewal by an Oregon licensee:

• 157 NatCE courses were reported for required annual renewal credit in 2023

- Ten (10) of 157 Nat CE courses were approved by the Board in error (business practice / not permitted per rule)
- o 480 NatCE applications (average) were reviewed by the Board in 2023

179 out 1200 (15%) active/inactive Oregon licensees attended NatCE courses in 2023:

85 Licensees attended one course
 82 Licensees attended 2-5 courses
 10 Licensees attended 6-10 courses
 2 Licensees attended 11-16 courses
 0.2% of Oregon Licensees
 0.2% of Oregon Licensees

59% - 65% of licensees attended NatCE courses DURING the 2023 annual renewal period

• January 1-31 11 Licensees 6% (*8 attended from Jan 1-6)

February 1- October 31
November 1-Decemer 31
63 Licensees 35%
105 Licensees 59%

119 (81%) of Board approved NatCE courses were 3 credit hours or less, only 18 courses (12%) were more than 5 credit hours:

0.5-3 hours 119 courses - 81%
 3.25-5 credit hours 10 courses - 7%
 5.25-7 credit hours 2 courses - 1%
 More than 7.25- credit hours 16 courses - 11%

Dr. Miller sent two petitions to all Oregon licensees in response to the proposed rule changes. Petition 1: signed by 17% of Oregon licensees. Petition 2: signed by 10% of Oregon licensees.

Petition #1: 205 (17%) Oregon licensees signed the primary petition urging 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 #2: 119 (10%) Oregon licensees signed urging the Board to consider one specific change:

- 1) OBNM Should Include NaturopathicCE.com as Being Eligible to Submit CE Applications through OBNM
 - 5. Discussion regarding additional amendments to proposed Oregon Administrative Rules Division 40 Continuing Education filed based on public comment. https://www.oregon.gov/obnm/Pages/Notice-of-Proposed-Rules-for-Public-Comment.aspx.
 - <u>850.040.0210</u>
 Annual Continuing Education Hours for Licensure Renewal
 - Adds approved accreditation services, providers and agencies, limits entities eligible for program approval
 - o Clarification Based on Public Comments:

- Rule expands the number of accredited and approved providers including increasing the number of approved CE providers specific to topics / courses required for CE renewal.
- Rule reduces the burden on licensees from having to submit individual CE approval applications.
- Licensees are NOT limited to taking CE courses only from OBNM or NUNM
- Licensees may apply for approval of a completed structured continuing education program not accredited, provided, or approved per 850-040-0215 FOR 32 HOURS IN ALL AREAS OF CE REQUIRED FOR RENEWAL. Please see Section 1(a)-(f).
- As part of the 32 hours required for renewal licensees may also apply for up to 10 hours for general education of self-directed activities listed in the rule. Please see 850-040-0125 Section 2(a)-(h)
- Discussion regarding possible changes to proposed rule:
 - 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.
 - (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

• 850.040.0220

Licensee application for continuing education approval, process, and limitations

- o Clarification Based on Public Comments:
 - Licensee Program Host: Licensees who host a live, in-person, structured continuing education program, in the State of Oregon, <u>attended</u> 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 <u>after the date of completion</u>
 - Current proposal allows Oregon licensee who hosts a live, inperson, structured continuing education program, in the State of

- Oregon, attended by <u>a minimum of ten (10)</u> Oregon licensees to apply for credit <u>after the program is completed</u> on behalf of the 10 or more licensed attendees.
- Licensees that host a program as defined above with <u>less than</u>
 <u>10</u> Oregon licensees; individual Oregon licensees who attended the program may apply for approval for attending the <u>CE</u>

 program after the program is completed.
- O Discussion regarding possible changes to proposed rule:
 - Oregon licensees who host a live, in-person, or <u>with synchronous</u> <u>remote participation</u>, structured continuing education program, in the State of Oregon, with minimum of ten (10) Oregon licensee <u>registrants</u> <u>may apply for approval up to 30 days prior to the program.</u>
 - Oregon licensees who host a live, in-person, or <u>with synchronous</u> <u>remote participation</u>, structured continuing education program, in the State of Oregon, with minimum of <u>five (5) Oregon licensee registrants</u> may apply for approval up to 30 days prior to the program.
 - Oregon licensees who host a live, in-person, or <u>with synchronous</u> <u>remote participation</u>, structured continuing education program, in the State of Oregon, <u>may apply for approval up to 30 days prior to the</u> <u>program.</u>

• <u>850.040.0230</u>

Criteria for Structured Continuing Education Course Approval, Activities Eligible for Approval, Required Documentation and Limitations

- o Clarification Based on Public Comments:
 - Licensees may apply for CE approval for up to 32 hours for completed structured continuing education, including up to 10 hours of general education for self-directed activities listed in the rule.
 - Licensees may apply for approval of a completed structured continuing education program not accredited, provided, or approved per 850-040-0215 FOR 32 HOURS IN ALL AREAS OF CE REQUIRED FOR RENEWAL. Please see Section 1(a)-(f)
 - As part of the 32 hours required for renewal licensees may also apply for up to 10 hours for general education of self-directed activities listed in the rule. Please see Section 2(a)-(h)

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

<u>850.040.0240</u>
 One-time Continuing Education Required Prior to Administering Injection and IV

Therapy, and Provider Requirements

- 7. 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
 - 850.040.0250
 One-time Continuing Education Required Prior to Administering or Supervising the Administration of IV and Injectable Ketamine.
- 8. Board discussion regarding the format of the rules, although the format is required for rule filing with the Secretary of State, the formatting is difficult to follow. Board request a cleaner / formatted version to make it easier to read.

Board discussion regarding revised draft provided and attached 850-040-0210 Continuing Education, Annual Requirements, Course Criteria and Compliance

No Board Discussion re: 0210(1) and (2), no changes to current / long standing requirements:

- (1) Active License: Licensees must annually submit certificates of completion for a total of thirty-two (32) hours of approved continuing education (CE) as follows:
- (a) Annual Mandatory Continuing Education Requirements:
- (A)Ten (10) hours of pharmacology
- (B) Two (2) hours of either professional ethics, boundaries, and communication; or suicide intervention and prevention
- (C) One (1) hour of cultural competency education every even number calendar year
- (D) One (1) credit hour of pain management every odd number calendar year
- (E) General Education: Remainder may be fulfilled through general education
- (2) Inactive License: Annually submit certificates of completion for a total of ten (10) hours of approved continuing education.

Board Discussion re: Section 3: ED discussed moving the criteria directly under the required education for greater clarity, ease of reading / understanding CE criteria of required CE. No changes made to the criteria

- (3) Continuing education criteria per subject area:
- (a) Pharmacology: Structured programs for physicians, course curriculum must include one of the following topic areas:
- (A) Properties and actions of pharmaceutical drugs and dosage forms,

- (B) Pharmaceuticals for therapy and prevention of disease states,
- (C) Maintain and enhance competence applicable to prescribing off the formulary compendium,
- (D) Pharmaceutical medication error prevention, prevention of events that may cause or lead to inappropriate pharmaceutical medication use or patient harm,
- (E) General topics related to pharmaceutical management
- (b) Professional ethics, boundaries, and communication: Structured programs for physicians and health care professionals focused on ethical practices, that offer concrete advice on how health care professionals should interact with patients and address critical decisions within their practice.
- (c) Suicide prevention: Structured programs for physicians and health care professionals on suicide risk assessment, treatment, and management consistent with Applied Suicide Intervention Skills Training (ASIST)
- (d) Cultural competency: Structured programs for physicians and health care professionals that meet the skill requirements established by the Oregon Health Authority under ORS 413.450 (Continuing education in cultural competency)
- (e) Pain management: Structured program for physicians and health care professionals with course curriculum that includes at least one of the following topic areas:
- (A) Current perspectives on the neuroscience and complex biopsychosocial nature of pain
- (B) International Association for the Study of Pain (IASP) Guidelines
- (C) Center for Disease Control (CDC) Opioid Prescribing Guidelines.
- (D) Oregon Health Authority Opioid Prescribing Guidelines

Board Discussion: Section (g) Professional Development replaced 850-040-0230(2)(a) / Self-directed activities (a) Structured business management and practice development programs, maximum of two (2) total hours. Program must support, educate, and enhance practice management skills and responsible practice development. Licensee must submit materials required in 850-040-0220(1).

Moved from the "self-directed" activity section b/c it made more sense to put it in criteria ED discussed changes made from previous draft. Based on discussions regarding licensee needs - the goal of the Board was to allow for professional / personal development to help deal with the challenges of being an ND - especially post covid. Intent was encouraging licensees to take courses geared to enhanced well-being, including practice strategies to avoid burn out. ND well-being= public and patients are safer. Also Board seeing issues regarding charting, record management, digital practice management that has led to concerns regarding patient confidentiality, transparency, access to records. New language below:

(g) Professional Development: Limited to (2) hours of general education annually, structured program for physicians and health care professionals with course curriculum that includes at least one of the following topic areas:

- (A) Licensee physical and mental wellness, managing stress and setting boundaries, implementing ADA productivity enhancers, reducing physician burn out, increasing career satisfaction, promote workplace civility and positive patient interaction.
- (B) Enhance practice management skills and develop practice resiliency strategies to meet health-care priorities, challenges, and crises, adapt and respond to the evolving needs of diverse patient populations.
- (C) Best practices for ensuring patient confidentiality and public safety in the digital clinic environment, effective charting, records access and transparency, record management, incorporating telemedicine in primary care.
- (f) General Education:
- (A) Presented by naturopathic physicians, other physicians, or other professionally acknowledged health care educators with expertise in the subject matter
- (B) Support, develop, and increase the knowledge, skills, and professionalism of naturopathic physicians
- (C) In the scope of practice of naturopathic medicine in the State of Oregon

Board Discussion:

(Section 4) Per public comment "approved / preapproved / accredited" are confusing and misleading terms. ED discussed CA rules with CA ED and reviewed other regulatory agency rules and public comment suggestions. Language change to following (4) Continuing education that meets the criteria in Section 3 will be accepted from. Included "meets the criteria" to protect against the rare instance licensee submits certificate from the enumerated list that is out of scope / program topic is not eligible for CE.

(Section 4(c)) Council on Naturopathic Medical Education (CNME) Purpose was to allow CE and residencies put on /supervised by CNME approved colleges. Only CNME approved residencies will be accepted. All accredited Nat. Schools have CNME approved residencies. Discussion regarding whether secondary CE put on for the benefit of the residents will also apply, whether CE put on by accredited schools would be accepted without application.

Section 4(d) deleted to correct a long standing error in the rule, Federation does not approve CE. NANCAC is the accreditation arm.

Section 4(f)-(i) and (1) Purpose of adding "conventional providers" was to save Licensees from applying for credit for mandatory education that is provided by / or approved by those listed. Upon further review – DEA does not provide education but directs medical providers to approved education for compliance with new requirements after the removal of the x waiver. DEA deleted from rule.

Section 4(h) AANP / OANP Conference Added - Always approved, highest licensee and hours reported. OANP Annual & Spring Conference - 212 Licensees / 18 CE hours. AANP Annual Conference - 300 licensees / 58 CE hours

(4) Continuing education that meets the criteria in Section 3 will be accepted from:

- (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)
- (h): AANP Annual / Bi-annual / Quarterly Conferences
- (i) OANP Annual / Bi-annual / Quarterly Conferences

Section 5 – based on public comment, allowing the enumerated providers in 5(a)-(d) may apply for credit PRIOR to the program if the program meets the criteria set in section 3 of the rule. These program providers need to apply to the Board for CE approval. Only programs offered by those listed are eligible for approval - i.e. AANP programs - NOT AANP approved programs.

Section 5(d) Majority of independent / individual public comment came from Oregon licensees who put on hands-on programs w/fewer than 10 OR licensees. Licensees who provide programs that do not customarily have 10 or more OR licensee attendees concerned that without Board's approval prior to the program, licensees will not register. Additional comments came from licensee who engage in group study type activities that are "live" but with remote participants, not held in person. Additional comment raised issues regarding limiting applicants for Board approval to only Oregon licensees. Comments regarding allowing non-Oregon licensees to apply for Board approval for CE developed and provided directly FOR OR licensees - ie. Community Compounding Pharmacy.

- (5) (d)(v) Added b/c ED is very concerned this will open another loophole of having the one "straw" licensee for credit, to compromise I've added a "trust but verify" audit model if it appears the program is employing a work around for credit.
- (5) Continuing education that meets the requirements in section 3, may be accepted by Board from the following providers. Program approval requests must be submitted to the Board no less than 30 days prior to the program date.
- a) Oregon Association of Naturopathic Physicians (OANP)
- b) American Association of Naturopathic Physicians (AANP)

- c) NUNM
- d) Live Program Providers:
- i. Program must be hosted in the State of Oregon.
- ii. Program must be live —no audio or videotaped presentations, slides, programmed instruction, or computer-assisted instruction will be accepted per this section of the rule.
- iii. Program must have Oregon licensee in-person and / or synchronous remote attendees.
- iv. Provider must provide documentation of compliance with criteria set forth as requested by the Board (audit model).
- v. Failure to adhere to the criteria or provide documentation requested by the Board may result in withdrawal of credit, prohibition from applying for approval of future programs, and licensee discipline.

Section 8(b) added additional clarification / specification regarding acceptable professional development courses.

- (8) Continuing Education will not be accepted in following program areas:
- (a) Programs that are proprietary in nature, promoting exclusive services, companies, or products.
- (b) Business Programming:
- i. accounting, tax liability, financial planning, money management
- ii. marketing, public relations, social media, media, outreach and branding
- iii. strategies related profitability, income streams, funding
- iv. contracts, leases, employment matters, human resource functions
- v. business ownership, determining business model or practice type
- (c) Insurance matters, including but not limited to billing practices and disputes.
- (d) Programs presented by a lay person(s) or directed to the public.
- (e) Programs that are not related to the scope of practice of naturopathic medicine.
- (9) Licensees must retain proof continuing education hours earned for a minimum of five calendar years.

Board discussion regarding revised draft provided and attached <u>850-040-0230 Licensee Self-Directed</u> Education – Structured Programs and Activities Eligible for Continuing Education Credit

Board Discussion (1)(c): Overwhelming number of comments re: the application process being onerous. Agreed. Board staff is working on a more efficient application process. Additionally, Board database is set for a significant upgrade (overhaul really) Criteria for approval is necessary in rule. But it is not necessary to put in rule all the approval process; (1) its evolving - (2) it would require additional rule changes down the road as the database changes are implemented.

- (1) Completed Structured Continuing Education Programs
- (a) Courses must meet the criteria set per 850-040-210(3)
- (c) Licensees must submit approval requests to the Board no more than 30 days from the date of completion.
- (d) Active Licensees may not submit approval requests to the Board after satisfying the 32 hours of continuing education as required in 850-040-210(1)
- (e) Inactive Licensees may not submit approval requests to the Board after satisfying the 10 hours of continuing education as required in 850-040-0210(2).
- 9. No additional Board discussion or changes to:
 - 850-040-0240 One-time Continuing Education Required Prior to Administering Injection and IV Therapy, and Provider Requirements
 - 850-040-0250 One-time Continuing Education Required Prior to Administering or Supervising the Administration of IV and Injectable Ketamine
- 10. Public Comment: Laura Farr, ED of AANP submitted written public comment. Q&A regarding the proposed changes. Farr commented / requested the Board add AANP and AANP approved programs to the rule as accepted CE.

All written public comment and responses provided posted on the Board website

850-040-0210 Continuing Education, Annual Requirements, Course Criteria and Compliance (consolidated rule for discussion purposes only)

- (1) Active License: Licensees must annually submit certificates of completion for a total of thirty-two (32) hours of approved continuing education (CE) as follows:
- (a) Annual Mandatory Continuing Education Requirements:
- (A)Ten (10) hours of pharmacology
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- (C) One (1) hour of cultural competency education every even number calendar year
- (D) One (1) credit hour of pain management every odd number calendar year
- (E) General Education: Remainder may be fulfilled through general education
- (2) Inactive License: Annually submit certificates of completion for a total of ten (10) hours of approved continuing education.
- (3) Continuing education criteria per subject area
- (a) Pharmacology: Structured programs for physicians, course curriculum must include one of the following topic areas:
- (A) Properties and actions of pharmaceutical drugs and dosage forms,
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- (b) Professional ethics, boundaries, and communication: Structured programs for physicians and health care professionals focused on ethical practices, that offer concrete advice on how health care professionals should interact with patients and address critical decisions within their practice.

- (c) Suicide prevention: Structured programs for physicians and health care professionals on suicide risk assessment, treatment, and management consistent with Applied Suicide Intervention Skills Training (ASIST)
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- (A) Current perspectives on the neuroscience and complex biopsychosocial nature of pain
- (B) International Association for the Study of Pain (IASP) Guidelines
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- (D) Oregon Health Authority Opioid Prescribing Guidelines
- (g) Professional Development: Limited to (2) hours of general education annually, structured program for physicians and health care professionals with course curriculum that includes at least one of the following topic areas:
- (A) Licensee physical and mental wellness, managing stress and setting boundaries, implementing ADA productivity enhancers, reducing physician burn out, increasing career satisfaction, promote workplace civility and positive patient interaction.
- (B) Enhance practice management skills and develop practice resiliency strategies to meet health-care priorities, challenges, and crises, adapt and respond to the evolving needs of diverse patient populations.
- (C) Best practices for ensuring patient confidentiality and public safety in the digital clinic environment, effective charting, records access and transparency, record management, incorporating telemedicine in primary care.
- (f) General Education:
- (A) Presented by naturopathic physicians, other physicians, or other professionally acknowledged health care educators with expertise in the subject matter
- (B) Support, develop, and increase the knowledge, skills, and professionalism of naturopathic physicians

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Commented [MB2R1]: Moved from the "self-directed" activity section b/c it made more sense to put it in criteria

- (C) In the scope of practice of naturopathic medicine in the State of Oregon
- (4) Continuing education that meets the criteria in Section 3 will be accepted from:
- (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)
- (d) Oregon Board of Pharmacy
- (e) Oregon Health Authority
- (f) Oregon Medical Board Medical, Osteopathic approved education only
- (g) Drug Enforcement Administration (DEA)
- (h): AANP Annual / Bi-annual / Quarterly Conferences
- (i) OANP Annual / Bi-annual / Quarterly Conferences
- (5) Continuing education that meets the requirements in section 3, may be accepted by Board from the following providers. Program approval requests must be submitted to the Board <u>no less</u> than 30 days prior to the program date.
- a) Oregon Association of Naturopathic Physicians (OANP)
- b) American Association of Naturopathic Physicians (AANP)
- c) NUNM
- d) Live Program Providers:
 - i. Program must be hosted in the State of Oregon.
 - ii. Program must be live -no audio or videotaped presentations, slides, programmed instruction, or computer-assisted instruction will be accepted per this section of the rule.
 - iii. Program must have Oregon licensee in-person and / or synchronous remote attendees.

Commented [MB3]: Per public comment - "approved / preapproved / accredited" are confusing and misleading. The Board will accept CE from all as enumerated list in this rule.

Commented [BMB*O4]: Purpose was to allow CE and residencies put on /supervised by cnme approved colleges

Commented [MB5]: Board discussion - re: CNME approved residency

Commented [MB6]: Purpose of adding "conventional providers" (d)-(g) was to save Licensees from applying for credit for mandatory education that is provided by / or approved by those listed.

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OANP Annual & Spring Conference - 212 Licensees / 18 CE hours

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- iv. Provider must provide documentation of compliance with criteria set forth as requested by the Board (audit model).
- v. Failure to adhere to the criteria or provide documentation requested by the Board may result in withdrawal of credit, prohibition from applying for approval of future programs, and licensee discipline.
- (8) Continuing Education will not be accepted in following program areas:
- (a) Programs that are proprietary in nature, promoting exclusive services, companies, or products.
- (b) Business Programming:

i. accounting, tax liability, financial planning, money management ii. marketing, public relations, social media, media, outreach and branding iii. strategies related profitability, income streams, funding iv. contracts, leases, employment matters, human resource functions v. business ownership, determining business model or practice type

- (c) Insurance matters, including but not limited to billing practices and disputes.
- (d) Programs presented by a lay person(s) or directed to the public.
- (e) Programs that are not related to the scope of practice of naturopathic medicine.
- (9) Licensees must retain proof continuing education hours earned for a minimum of five calendar years.

Commented [MB10]: ED is very concerned this will open another loophole of having the one "straw" licensee for credit, to compromise I've added a "trust but verify" audit model if it appears the program is a work around for credit.

Commented [MB11]: additional clarification / specification

850-040-0230 Licensee Self-Directed Education – Structured Programs and Activities Eligible for Continuing Education Credit (discussion purposes only)

- (1) Completed Structured Continuing Education Programs
- (a) Courses must meet the criteria set per 850-040-210(3)
- (c) Licensees must submit approval requests to the Board no more than 30 days from the date of completion.
- (d) Active Licensees may not submit approval requests to the Board after satisfying the 32 hours of continuing education as required in 850-040-210(1)
- (e) Inactive Licensees may not submit approval requests to the Board after satisfying the 10 hours of continuing education as required in 850-040-0210(2).
- (2) Completed Self-Directed Activity: Hours, Approval
- (a) Ten (10) hours accepted annually from combination of activities listed in section (3)
- (b) Hours limited to maximum hours stated per activity, excess hours will not be accepted toward annual renewal
- (c) Licensees must submit approval requests to the Board no more than 30 days from the date of completion.
- (3) Licensee Self-Directed Activity List: Criteria and Required Materials
- (a) Peer reviewed publication, authorship, or review, maximum of three (3) total hours. Subject of the article must be in the scope of practice of naturopathic medicine in the State of Oregon. Licensees must provide the Board with the following:
- (A) Authorship:
- (i) Copy or excerpt (up to ten (10) pages maximum) of the published article, including the name and issue of the peer reviewed publication,
- (ii) Written description (up to five (5) pages maximum) of how research, development and content of the published article support, develop, and increase the knowledge, skills, and professionalism of naturopathic physicians.
- (iii) Written record of the number of hours spent on research, development and writing the publication
- (B) Review and Report:
- (i) Copy or excerpt (up to ten (10) pages maximum) of the published article, including the name and issue of the peer reviewed publication
- (ii) Written summary (up to five (5) pages) describing how the content of the article supports, develops, and increases the knowledge, skills, and professionalism of naturopathic physicians
- (iii) Written record of the dates and number of the hours spent reviewing and summarizing material,
- (b) Formal protocol writing for a health care facility or government health care agency, maximum of

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- three (3) total hours. Subject of the formal protocol must be in the scope of practice of naturopathic medicine in the State of Oregon. Licensees must submit the following:
- (A) Copy or excerpt (up to ten (10) pages maximum) of the completed formal protocol
- (B) Written description (up to five (5) pages maximum) of how the research, development, content and writing of the formal protocol supports, develops, and increases the knowledge, skills, and professionalism of naturopathic physicians
- (C) Certificate/letter of completion with date protocol was finished, total number of hours spent on research, development, and protocol writing signed by licensee's supervisor, submitted
- (c) Naturopathic Physicians Licensing Examinations (NPLEX) Committee for the development and writing of the NPLEX examinations, maximum three (3) total hours. Licensees must submit the following:
- (A) Written description (up to five (5) pages maximum) of how exam research, development and writing support, develop, and increase the knowledge, skills, and professionalism of naturopathic physicians
- (B) Certificate/letter of completion with date of completion, and total number of hours spent on research, development, and writing signed by licensee's supervisor or NPLEX designee,
- (d) Research related to the advancement of naturopathic medicine, for a recognized educational or medical institution or organization; maximum of six (6) total hours. Licensee must submit the following:
- (A) Attestation Licensee does not have financial conflicts or fiduciary relationships with the educational or medical institution or organization where licensee is conducting the research
- (B) Written description (maximum ten (10) pages) how licensees research is in the scope of practice of naturopathic medicine in the State of Oregon, and supports, develops, and increases the knowledge, skills of naturopathic physicians
- (C) Certificate/letter of completion with date research was completed, total number of hours spent on research and development, signed by licensee's supervisor,
- (e) 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. Licensee must submit the following:
- (A) Declaration the presentation was developed and created in the calendar year applying for credit, and no portion of the presentation has been used in previous years.
- (B) Excerpt of presentation materials (up to ten (10) pages maximum), agenda, schedule, and total length of the presentation

- (C) Written description (up to ten (10) pages maximum) how research, development and content of the presentation supports, develops, and increases the knowledge, skills, and professionalism of naturopathic physicians
- (D) Written record of hours spent researching, developing the content of the presentation, and length of presentation submitted total number of hours spent on research and development, signed by licensee's supervisor
- (f) Teaching an accredited graduate level course in the scope of practice of naturopathic medicine in the State of Oregon; maximum six (6) total hours. Licensee must submit the following:
- (A) Declaration the course material was developed and created in the calendar year applying for credit, and no portion of the course material has been used in previous years.
- (B) Excerpt of course materials (up to ten (10) pages maximum), syllabus, schedule, with the name of the accredited institution and faculty supervisor
- (C) Written description (up to ten (10) pages maximum) how research, development and content of the course supports, develops, and increases the knowledge, skills, and professionalism of naturopathic physicians
- (D) Certificate/letter of completion with total number of hours spent on research and development of course, signed by licensee's faculty supervisor
- (g) 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. Licensee must submit the following:
- (A) Name of medical facility, preceptor, and licensee's direct supervisor
- (B) Certificate/letter of completion with a record of attendance and total hours licensee participated in the preceptor program, signed by licensee's preceptor/ supervisor,