



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

March 9, 2021

[REDACTED]

Seattle, WA 981 [REDACTED]

SUBJECT: RULE PETITION

Dear Dr. [REDACTED]:

This letter is in response to the outcome of your rule petition regarding the Board of Naturopathy (board) continuing education (CE) rules.

Your petition was a request to amend WAC 246-836-080 to include CE courses in Category 1 that have been approved by other state or Canadian province licensing boards for naturopathic physicians. The board agreed to grant your petition on April 3, 2020; however, the board could not move forward with discussions on your petition until this specific rule section became effective January 1, 2021. Until that date, the Office of the Code Reviser considered the rule section encumbered and it could not be considered for amendment.

The board requested CE data from the other licensing boards but only received information from the California Naturopathic Medicine Committee (CNMC) and Oregon Board of Naturopathic Medicine (OBNM).

The board reviewed the information received and had an extensive discussion at their February 12, 2021, business meeting. It appears that CNMC and OBNM allow for extensive overlap with non-naturopathic accrediting bodies in their approved CE organizations. For example, Oregon approves numerous courses that are accredited by the Accreditation Council for Continuing Medical Education (ACCME). This particular accrediting body is identified in the board's rule as a Category 2 accrediting organization.

The board feels strongly that naturopathic accrediting organizations are the best means to ensure substantiation of naturopathic principles in continuing education content. Without such affirmation, the practice of naturopathic medicine is at risk of erosion of the very fundamentals that set it apart from allopathic doctrine. Therefore, the board determined there is insufficient reason to move forward with amendments to the rule section.

If you have any questions, please contact Susan Gragg, Program Manager, by telephone at 360-236-4941, by email at naturopathy@doh.wa.gov, or in writing to the Department of Health, Board of Naturopathy Program, PO Box 47852, Olympia, WA 98504-7852.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chad Aschtgen', written in a cursive style.

Chad Aschtgen, ND, Chair
Board of Naturopathy
Department of Health

cc: Tami Thompson, Regulatory Affairs Manager
Martin Pittioni, Director, Health Professions and Facilities
Susan Gragg, Program Manager, Board of Naturopathy