December 13, 2019

Department of Public Health

Bureau of Health Professions Licensure

Board of Registration in Naturopathy

239 Causeway Street, Suite 500

Boston, MA 02114

RE: Proposed regulations 273 CMR 6.05: Categories of Continuing Education Programs

Dear Naturopathic Regulators,

The Federation of Naturopathic Medicine Regulatory Authorities’ (FMNRA’s) mission is to protect the public by connecting regulatory authorities and promoting standards of excellence in the regulation of naturopathic medicine. The Federation supports new and existing regulatory organizations in fulfilling their statutory obligations to regulate the profession in the interest of public protection. The FNMRA envisions a coordinated regulatory system for naturopathic medicine throughout the United States.

The Federation appreciates this opportunity to comment 273 CMR. While the FNMRA supports the vast majority of the language in the proposed regulations, there is one area, 273 CMR 6.05, where we think an addition would support regulation of naturopathic doctors in the Commonwealth: The addition of North American Naturopathic Continuing Education Accreditation Council (NANCEAC) as a recognized accreditor of naturopathic continuing education programs in the Commonwealth.

**The Benefits to Regulatory Authorities (RAs) that accept NANCEAC:**

* RAs can trust that CE activities with NANCEAC accreditation will offer meaningful education that is designed to improve practice outcomes.
  + NANCEAC standards are as high as or higher than all other naturopathic CE approval organizations.
  + Each activity will be free from commercial bias.
  + Developers and presenters of CE activities will disclose all financial relationships with or support from commercial entities to the participants.
  + Each activity will address a gap in knowledge, competence, or performance in the practice of naturopathic medicine.
  + Learning assessments will be required to demonstrate the CE activity clearly addressed the learning objectives (closed the practice gap in in knowledge, competence, or performance)
  + Once accredited, the CE provider will be required to submit regular reports and be subject to audits to maintain their accreditation.
* RAs will always retain authority over CE approval. (RAs can choose to add NANCEAC-accredited providers to their lists of qualified CE providers.)

**NANCEAC improvements above current naturopathic continuing education regulation:**

* NANCEAC-accredited CE activities must address a practice gap (identified by Needs Assessments and development of Learning Objectives). By addressing practice gaps, the CE activity will lead to improvements in practice outcomes.
* Each NANCEAC-accredited CE activity will be evaluated to see if learning objectives are reached.
* NANCEAC requires disclosure of relevant financial relationships (to NANCEAC and participants) for everyone involved in the development and presentation of the CE activity.
* NANCEAC monitors of each CE activity for adherence to standards by requiring reporting forms (CE development worksheet and post-activity report).
* NANCEAC-accredited CE activities encourage active learning.
* An individual is identified in each CE provider’s organization (CE Program Director) who is completely responsible for adherence to NANCEAC standards.

Thank you for the opportunity of

Sincerely,



Shannon Braden, ND

*Federation of*

*Naturopathic Medicine*

*Regulatory Authorities*

9220 SW Barbur Blvd., Suite 119, #321 • Portland, Oregon 97219 • phone: 503-244-7189 • fax: 503-452-3943 • info@fnmra.org • www.fnmra.org

**The Benefits to Regulatory Authorities (RAs) that accept NANCEAC (continued):**

* Accepting NANCEAC will alleviate RA’s workload of approving CE activities.
* There is no cost to regulatory authorities. NANCEAC will be funded by the fees the CE providers pay for accreditation.

**NANCEAC improvements above current naturopathic continuing education regulation:**

* NANCEAC-accredited CE activities must address a practice gap (identified by Needs Assessments and development of Learning Objectives). By addressing practice gaps, the CE activity will lead to improvements in practice outcomes.
* Each NANCEAC-accredited CE activity will be evaluated to see if learning objectives are reached.
* NANCEAC requires disclosure of relevant financial relationships (to NANCEAC and participants) for everyone involved in the development and presentation of the CE activity.
* NANCEAC monitors of each CE activity for adherence to standards by requiring reporting forms (CE development worksheet and post-activity report).
* NANCEAC-accredited CE activities encourage active learning.
* An individual is identified in each CE provider’s organization (CE Program Director) who is completely responsible for adherence to NANCEAC standards.

The FNMRA sees the addition of NANCEAC to 273 CMR 6.05: Categories of Continuing Education Programs as an improvement to naturopathic regulation. We appreciate your thoughtful consideration of this addition.

If there are any further questions regarding the FNMRA or NANCEAC, please feel free to contact me by phone or email.

Sincerely,



Shannon Braden, ND

Program Director

Federation of Naturopathic Medicine Regulatory Authorities

9220 SW Barbur Blvd., Suite 119, #321

Portland, Or 97219

503-244-7189 voice

shannonbraden@fnmra.org

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