



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

NOTICE OF ADOPTION OF A POLICY STATEMENT

Title of Policy Statement: Continuing Education Requirements During the COVID-19 Response | Policy number BON 20-01.1

Issuing Entity: Board of Naturopathy

Subject Matter: Addressing the impact COVID-19 response measures are having on the naturopathic physician profession with regard to meeting the continuing medical education (CE) requirements.

Effective Date: November 20, 2020

Contact Person: Susan Gragg, Program Manager
PO Box 47852
Olympia, WA 98504-7852
360-236-4941
naturopathy@doh.wa.gov

OFFICE OF THE CODE REVISER
STATE OF WASHINGTON
FILED

DATE: February 01, 2021

TIME: 1:22 PM

WSR 21-04-113

*Department of Health
Office of Health Professions
Board of Naturopathy*

Policy Statement

Revised – 10/18/11

<i>Title:</i>	Continuing Education Requirements During the COVID-19 Response	<i>Number:</i> BON 20-01.1
<i>References:</i>	Chapter 18.36A RCW; WAC 246-836-080 ; WAC 246-12-210	
<i>Contact:</i>	Susan Gragg, Program Manager	
<i>Phone:</i>	360-236-4941	
<i>Email:</i>	naturopathy@doh.wa.gov	
<i>Effective Date:</i>	November 20, 2020	
<i>Supersedes:</i>	BON 20-01 effective April 3, 2020	
<i>Approved By:</i>	Chair, Board of Naturopathy	

In response to the Governor issued [Proclamation 20-25 Stay Home—Stay Healthy](#) that requires people to cease leaving their homes except to conduct essential activities or for employment of essential services; in response to other impacts of the coronavirus disease (COVID-19) pandemic; and within the authority under WAC 246-12-210 that allows the Board of Naturopathy (board) to grant an extension of continuing education (CE) requirements under what it determines are “extenuating circumstances”, the board determined naturopathic physicians have been unable to timely complete CE requirements. The board extended CE attestation to coincide with the license renewal extension authorized by the Secretary of Health. Naturopathic physicians attested to CE through September 30, 2020.

Furthermore, during this timeframe the board determined to accept online courses that meet the CE requirements in [WAC 246-836-080](#) through December 31, 2021. In addition, the board will also accept completion of prerecorded courses through December 31, 2021, whether or not an examination is required upon completion. Originally, this statement was filed with the extension expiring on December 1, 2020. This filing extends that expiration through December 1, 2021.

Other circumstances related to completing CE and/or credentialing requirements beyond the individual licensee’s control will be considered on a case-by-case basis, consistent with [WAC 246-836-080\(4\)](#).

Background

As the spread of COVID-19 continues and the Center for Disease Control and Prevention (CDC) guidance continues to encourage the restriction of large gatherings, organizations and entities have canceled large professional development events and conferences that included significant continuing medical education opportunities.

Many naturopathic physicians, while not explicitly prohibited from providing patient care, have either scaled back or ceased practicing during the COVID-19 pandemic to adhere to the social distancing

guidelines. The measures in place attempting to stem the spread of COVID-19 continue to contribute to financial hardship and uncertainty.

As well, without the capability to access expected routinely attended CE offerings and as financial uncertainty increases, naturopathic physicians are without the ability and/or the means to meet their CE obligations for renewal of their licenses.

On February 29, 2020, the Governor issued [Proclamation 20-05](#) declaring a State of Emergency for all counties in the state of Washington.

Since large gatherings contribute to the spread of COVID-19 by offering more opportunities for person-to-person transmission, on March 15, 2020, the CDC issued guidance discouraging all gatherings of 50 or more. On March 16, 2020, the Governor issued [Proclamation 20-14](#) prohibiting gatherings of 50 or more in all counties in the state of Washington.

On March 23, 2020, the Governor issued [Proclamation 20-25 Stay Home—Stay Healthy](#) that requires people to cease leaving their homes except to conduct essential activities or for employment of essential services. This proclamation was adjusted to move forward with a phased reopening for business and other activities; however, such adjustments also included freezes and amendments to some counties' reopening phases due to increased COVID-19 infection rates. On July 24, 2020, the Governor issued [Proclamation 20-25.7 Safe Start—Stay Healthy, County-by-County Phased Reopening](#).

[WAC 246-836-080](#) requires naturopathic physicians to complete twenty (20) hours of CE every year. Effective January 1, 2021, naturopathic physicians will be required to complete sixty (60) hours of CE every two years.

[WAC 246-12-210](#) states: "A practitioner may be excused from or granted an extension of continuing education requirements due to illness or other extenuating circumstances. The profession's regulatory entity determines when the requirements may be waived or may grant an extension."

On April 2, 2020, and in accordance with [RCW 43.70.280](#), Secretary Wiesman extended health profession license expiration dates for licenses up for renewal between April 1 and September 30, 2020. Renewal payments were not required until September 30, 2020.

In summary, due to stay at home orders and shutdowns related to COVID-19 response and in accordance with [WAC 246-12-210](#) that allow a profession's regulatory entity to extend CE requirements when they determine that there are "extenuating circumstances", the board determined naturopathic physicians unable to timely complete CE were granted a CE extension that coincided with the license renewal extension authorized by the Secretary of Health. Naturopathic physicians attested to CE through September 30, 2020.

Furthermore, during this timeframe the board determined to accept online courses that meet the CE requirements in [WAC 246-836-080](#) through December 31, 2021. In addition, the board will also accept completion of prerecorded courses through December 31, 2021, whether or not an examination is required upon completion.

Other circumstances related to completing CE and/or credentialing requirements beyond the individual licensee's control will be considered on a case-by-case basis, consistent with [WAC 246-836-080\(4\)](#).