



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

NOTICE OF ADOPTION OF AN INTERPRETIVE STATEMENT

Title of Interpretive Statement: Continuing Education Pharmacology Documentation
Interpretive Statement Number BON 21-01

Issuing Entity: Board of Naturopathy

Subject Matter: Clarifying how naturopathic physicians are able to meet the continuing education pharmacology documentation requirements

Effective Date: May 14, 2021

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

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

Interpretive Statement

Revised – 10/18/11

<i>Title:</i>	Continuing Education Pharmacology Documentation	<i>Number:</i> BON 21-01
<i>References:</i>	Chapter 18.36A RCW; WAC 246-836-080	
<i>Contact:</i>	Susan Gragg, Program Manager	
<i>Phone:</i>	360-236-4941	
<i>Email:</i>	naturopathy@doh.wa.gov	
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<i>Supersedes:</i>	N/A	
<i>Approved By:</i>	Chair, Board of Naturopathy	

The purpose of this Interpretive Statement is to clarify how the Board of Naturopathy (board) accepts the designation of pharmacology content to meet the requirement in [WAC 246-836-080\(3\)](#). This rule subsection, in part, states, “Course content, or a portion thereof, must be designated as pharmacology by an entity listed in subsection (5)(a)(i) or (b)(i) of this section.”

For the purposes of demonstrating that all or a portion of a course’s content is designated as pharmacological, the board will accept information included on course completion certificates, transcripts, course descriptions, course brochures, or course registration forms as meeting the requirement in WAC 246-836-080(3). So long as other documentation as listed above supports the pharmacological content, the number of pharmacy hours do not need to be included on the course completion certificate.

Background

The board adopted amendments to WAC 246-836-080 as WSR 19-08-032 on March 27, 2019 concerning continuing education (CE) requirements for licensed naturopathic physicians. The adopted amendments increase the number of hours, lengthened the reporting cycle, and provided specific direction on options for meeting the continuing education requirement. The previous rules required naturopathic physicians to report twenty hours of CE every year. The adopted amendments changed that requirements to 60 hours every two years and include a requirement that 15 hours must have pharmacy content. The adopted amendments also clarify acceptable CE by identifying approved providers and acceptable ways for naturopathic physicians to satisfy the requirements, such as allowing a portion to be fulfilled through courses relevant to other health professions if the content is consistent with naturopathic scope of practice. The board set a delayed effective date of January 1, 2021, in order to provide licensees enough time to meet the new requirements.

The board has since learned that very few approved entities include the number of pharmacy hours on the course completion certificates. This creates a hardship for licensees to fulfill the pharmacology requirement and the board has received several rule petitions. The petitions request that the board amend this section of rule to give greater clarity in how the pharmacology requirement may be documented. The board held a special meeting on April 30, 2021 and determined to grant the petitions. The board authorized rulemaking to consider possible amendments. For expediency, the board has issued this interpretive statement pending possible rule amendments.

In summary, for the purposes of demonstrating that all or a portion of a course's content is pharmacological, the board will accept information included on course completion certificates, transcripts, course descriptions, course brochures, or course registration forms as meeting the requirement in WAC 246-836-080(3). So long as other documentation as listed above supports the pharmacological content, the number of pharmacy hours do not need to be included on the course completion certificate.