



Rebecca Mitchell, Executive Officer
California Board of Naturopathic Medicine
1747 North Market Blvd., Suite 240
Sacramento, CA 95834

August 27, 2024

Dear Ms. Mitchell,

On behalf of Live Well Clinic, I am submitting these comments concerning the California Board of Naturopathic Medicine's Notice of Proposed Action to amend Section 4240 of the California Code of Regulations. As a practice committed to the principles and professional application of naturopathic medicine, we are particularly concerned with the proposed 150% increase in the biennial renewal fee for naturopathic doctors from \$800 to \$1,200.

We understand and respect the Board's responsibility to secure adequate funding to perform its consumer protection mandate effectively. However, the magnitude of the increase raises significant concerns regarding the Board's current financial management and the justifications provided for such a steep hike, especially as it considerably surpasses the current inflation rate.

Moreover, when compared to the renewal fees required of medical doctors (MDs) in California, the proposed fees for naturopathic doctors seem disproportionately high. This discrepancy could potentially place an undue financial strain on practitioners within our field, affecting the economic viability of their practices.

We respectfully request that the Board provide detailed financial transparency regarding its expenditures and the specific needs that have led to the proposal of such substantial fee increases. It is vital for the naturopathic medical community to have access to this information to fully understand and assess the impact of these changes.

Additionally, we urge the Board to consider alternative fiscal strategies that would lessen the financial impact on naturopathic practitioners while still allowing the Board to meet its operational and regulatory requirements, such as implementing incremental fee increases aligned more closely with inflation rates.

While we support the Boards' mission to regulate the practice of naturopathic medicine effectively, we advocate for adjustments to the proposed fee increases to ensure they are justifiable, equitable, and transparent. We look forward to a detailed response from the Board and a reconsideration of the proposed fee structures.

Thank you for your attention to these matters. We appreciate the opportunity to provide input on this important issue affecting our profession.

Sincerely,

Drs. Sonja Fung, Annissa Ceja, and Delaney Quick