

California Board of Naturopathic Medicine

Meeting Minutes

March 28, 2024

**MEMBERS
PRESENT:**

Dara Thompson, ND, Chair
Setareh Tais, ND
Minna Yoon, ND
Bruce Davidson, PhD
Vera Singleton, ND
Andy Yam, MPP
Diparshi Mukherjee, DO – partial attendance

**MEMBERS
ABSENT:**

Diparshi Mukherjee, DO – partial attendance (*member was excused with cause at 12:25 p.m.*)

**STAFF
PRESENT:**

Rebecca Mitchell, Executive Officer (EO)
Yuping Lin, Board Counsel, Legal Affairs Div., DCA
Kristy Schieldge, Regulations Counsel, Legal Affairs Div., DCA
Elizabeth Coronel, SOLID Strategic Planning Manager, DCA
Sarah Irani, SOLID Strategic Planning Specialist, DCA
Cesar Victoria, Webcast Specialist, Office of Public Affairs, DCA
David Bouilly, Moderator, SOLID Unit, DCA
Raquel Oden, Program Analyst, Co-Moderator, CBNM
Florencia Francisco, Consumer Protection Services Analyst, CBNM

**MEMBERS OF
THE
AUDIENCE:**

N/A

Agenda Item 1

Call to Order/Roll Call/Establishment of a Quorum

Dara Thompson, N.D., Chair, California Board of Naturopathic Medicine (CBNM or Board) called the meeting of the CBNM to order on March 28, 2024, at 10:21

a.m. A quorum was present and due notice was provided to all interested parties.

Agenda Item 2 Public Comment

There were no public comments.

Agenda Item 3 Board Chair Welcome, Discussion, and Possible Action

Dr. Dara Thompson, ND, Chair had no report to provide during this meeting, but welcomed everyone to the meeting.

No public comments were made during this agenda item.

Agenda Item 4 Review and Possible Approval of Board Meeting Minutes

EO Mitchell provided the Board members with a draft copy of the 12/14/2023 and 12/27/2023 Board meeting minutes. The Board had an opportunity to review the minutes prior to the commencement of the meeting.

The Board members approved the meeting minutes with grammatic amendments taken during the meeting.

a. December 14, 2023

Minor grammatical amendments made.

b. December 27, 2023

Minor grammatical amendments made.

No public comments were made during this agenda item.

Motion – Davidson / *Second* – Yam, to approve the 12/14/2023 and 12/27/2023 board meeting minutes with amendments taken during the meeting. Roll call vote taken; motion carried 5-0-1. (YES – Thompson, Yoon, Singleton, Davidson, Yam, Davidson / NO – none / Abstentions – Tais).

Agenda Item 5 Discussion and Possible Action on Department of Consumer Affairs (DCA) Update

a. Executive Office

Judie Bucciarelli from DCA Board and Bureau Relations was present and provided the board with the following DCA updates:

Business, Consumer Services, and Housing Agency Update

Last month, the Business, Consumer Services, and Housing Agency officially welcomed Secretary Tomiquia Moss. DCA extended a warm welcome to Secretary Moss and looks forward to working with her.

Budget Letter 23-27 - Current Year Expenditure Reductions

Boards and Bureaus are reminded of the Department of Finance's (DOF) Budget Letter that directed all State agencies under the Governor to take immediate action to reduce current year expenditures, with certain exceptions for time-sensitive, emergency-related, mission-critical, or information security (IT) needs.

DEI Update

The Diversity, Equity, and Inclusion (also referred to as DEI) Steering Committee will hold its next meeting on April 5th. The Committee will discuss DEI actions, priorities, and language access. The Committee will also elect a new Chairperson.

DEI training opportunities continue to be a priority for the Department. DCA's SOLID trainers underwent a DEI certification program with the University of Massachusetts in April of last year. Before this certification, SOLID offered 3 DEI related courses for employees. After obtaining certification, SOLID has developed 11 new courses. In 2023, DCA achieved 2,079 DEI course completions.

The board was advised about the training courses available to its members on DCA's Learning Management System.

Legislative Hearing Related to Interstate Licensure Compacts

Invited by the Senate Committee on Business, Professions, and Economic Development, DCA Director Kirchmeyer testified in February at an informational hearing focused on interstate licensure compacts. The Director discussed the impact of licensing compacts on consumer protection, licensees, and boards and bureaus, as well as the Legislature. Director Kirchmeyer answered questions from the Committee and provided examples, demonstrating that compacts are not a one size fits all solution. Rather, there are many factors for the Legislature to consider, including the priorities of consumer protection, and licensing standards that should not be compromised or lowered. 17 of the 36 (47%) boards

and bureaus under DCA offer some form of reciprocity already. With several bills recently introduced proposing licensure compacts for DCA boards, the department will continue to work with the Legislature on this issue.

Complaint Prioritization and Referral Guidelines for Healing Arts Boards - Effective March 1, 2024

In collaboration with the DCA Executive Leadership Team and the Executive Officer/Bureau Chief Cabinet, DCA's Division of Investigation (DOI) updated the Complaint Prioritization and Referral Guidelines for Healing Arts Boards. The guidelines were shared with Board leadership, and as of March 1, 2024, these guidelines should be used when determining which complaints to refer to the DOI and what can remain with each respective program. Of note, referral guidelines for the professions and vocations boards/bureaus are in progress and will be completed soon.

Form 700 Reminder

Board and committee members are required to file a Statement of Economic Interests (Form 700) within 30 days of their appointment, annually, and within 30 days of leaving office. This year's annual filing period covers the prior calendar year (January 1 through December 31, 2023). The official deadline for filing is Tuesday, April 2, 2024. DCA requested that Form 700 filers complete the e-filing by Friday, March 15, 2024.

Board Member Orientation Training

DCA Board Members are required to complete Board Member Orientation Training (BMOT) within one year of appointment and re-appointment. This training provides an important overview of the roles and responsibilities of a board member, and access to the variety of resources and support DCA has to offer. Board Members can register through DCA's Learning Management System for upcoming 2024 trainings, which will be offered virtually on June 18 and October 22, 2024.

There were no member questions or public comments made.

b. Budget Office

Matt Nishimine, DCA Fiscal, provided an overview of current revenue and expenditures and an update on the Board's current structural imbalance. Mr. Nishimine advised that the Board has a fiduciary responsibility to the State to not go into the "red" and cannot allow fiscal insolvency. He further provided the members with information from the meeting materials

showing the Board's current fund condition (as provided in Item 8 of the meeting materials) so that they have all the data should they seek authority to correct the imbalance. An analysis of the Board's fund condition, along with workload costs, were provided to the members as set forth in the meeting materials. AB 2685's (Board's prior Sunset Bill) mandates caused additional costs to be incurred by the Board and ongoing the Board is expending more than it is bringing in revenue, i.e., "structural imbalance." Options for the Board to consider include decreasing expenditures and increasing fees.

There were no public comments made during this item.

Agenda Item 6 Discussion and Possible Action on Executive Officer's Report

EO Mitchell provided reports on the following items:

Board Member Vacancies:

The Board is still experiencing appointment vacancies. Currently, the following Board Member positions are vacant:

- 1 professional member (ND, licensed in the state of CA) vacant since 2/2022
- 1 physician and surgeon, (MD/DO physician) vacant since 9/2019.

Dr. Setareh Tais, N.D. was appointed to a professional member vacancy by Governor Newsom on February 29, 2024. Dr. Tais received her Bachelor of Science in Animal Physiology and Neuroscience from the University of California, San Diego and her Doctorate of Naturopathic Medicine from Bastyr University in 2009. After she completed a 3-year family medicine residency in Marysville, Washington in 2012, she moved back to her hometown of Fresno, CA where she is currently seeing patients at her private medical practice, Fresno Holistic Medicine.

Dr. Tais served on the board of the California Naturopathic Doctors Association and co-chaired the Professional Development and Public Affairs Committees; She also served a two-year term as president of the CNDA from 2014-2016. She was a Founding Director of the Endocrinology Association of Naturopathic Physicians from 2013-2016. In addition, she was also recognized as the "2018 Doctor of the Year" for her contributions to the practice of naturopathic medicine in California. The Board welcomed Dr. Tais to the CBNM.

Staff will continue working with DCA and the Governor's Appointment Office to get the last two positions filled.

Staffing:

During the 2022 Oversight (Sunset) Review process, the Board provided information to the Legislature about the ongoing issues with unlicensed practice. Assembly Bill 2685 (Chapter 414, Statutes of 2022) was the sunset bill that changed the Committee to the California Board of Naturopathic Medicine along with providing authority to hire an additional staff member to assist with the large unlicensed activity.

Board staff developed a duty statement for the new Consumer Protection Services Analyst position as a fulltime, permanent position. The recruitment process occurred in late December 2023.

On February 5, 2024, Ms. Florencia Francisco joined the CBNM staff as the new Consumer Protection Services Analyst. Ms. Francisco worked for other boards under the Department of Consumer Affairs and brings with her several years of enforcement and complaint resolution experience. She received multiple awards from the California Contractors State License Board for being processing and closing the most cases.

Ms. Raquel Oden has been with the board for 10 years and provided both licensing and enforcement services during her time in that position. With the creation of the new Consumer Protection Services Analyst position, Ms. Oden has taken on the duties as the Executive Officer's backup for administrative duties, including being another resource for our board members. Ms. Oden will continue to perform license and credentialing roles for the board.

Enforcement case Types:

Although the case types were not separated for today's meeting, the board identified the following violations as follows:

The unlicensed activity consists of:

- Using the naturopathic doctor (ND) title (CA Bus. Prof. Code §3660)
- Not providing a written disclaimer of unlicensed practice to their client and having a signed copy by the client on file per CA business and profession section 2053.6. (CA Bus. Prof. Code §3644)
- Providing Diagnosis in violation of CA Business and Professions code section 2053.5. (CA Bus. Prof. Code §3644)

- Advising their clients to discontinue medication prescribed by licensed healthcare providers also prohibited within CA BPC section 2053.5 (CA Bus. Prof. Code §3644)
- Providing Treatment within the scope of an ND without the benefit of a license (CA Bus. Prof. Code §3644)
- Causing harm or death to clients (CA Bus. Prof. Code §3644)

Violation Types that make-up enforcement cases against licensed NDs and applicants are separated into several violation categories. Currently, the Board has 53 total enforcement cases opened against licensees. Of those 53 cases, the breakdown of violation types are as follows:

- Advertising violations
- Failure to update address with the Board
- Substance-abuse related violations
- Unprofessional Conduct
- Records only – (not releasing upon patient request)
- Patient harm

Board Member Training:

- EEO Policy
- Board Member Orientation Training (BMOT)
- Defensive Driving Training
- Ethics
- Sexual Harassment Prevention
- Information Security

No public comments were made during this agenda item.

Agenda Item 7 Presentation on Rulemaking Process Overview

Kristy Schiedge, DCA Regulations Counsel, provided an in-depth presentation on the regular Rulemaking process for the benefit of board members and staff. The Board was presented a copy of the PowerPoint presentation, which is included in the meeting materials.

During the “*general overview of Rulemaking process*” section, board member Andy Yam requested clarification on the 45-day public comment period and when a hearing “may” be required by the Board. Ms. Schiedge advised that a hearing can either come through motion by the Board at the beginning of the rulemaking or from the public if requested within 15 days before the close of the

public comment period. She also advised that any adverse comments made during the public comment period would be required to be brought back to the Board for a policy decision; whether to accept or reject a comment is a policy decision and not subject to delegation to staff or the Executive Officer of the Board. The process of reviewing and revising text continues until the Board decides to reject all adverse comments and adopt a final text proposal. She explained that there are many layers of administrative review in place to protect the integrity of the process and ensure the proposed regulations are legally defensible and economically sound.

During the “*concept phase*” presentation, Chair Thompson inquired about the \$10-million-dollar (\$10M) threshold for what the Administrative Procedure Act (APA) calls “major” regulations and whether that threshold applies to the Board’s cost to implement the proposed regulations or fiscal impact to businesses. Ms. Schieldge advised that any time that a proposed regulation creates a business fiscal impact of \$10M or more, it would pose a great burden to the community. If it is identified that there would be such an economic impact, the board must seek public and stakeholder engagement. Nevertheless, even if there is no large fiscal impact, stakeholder meetings can be valuable as it shows the Board engaged stakeholders before the policy decision was made. This is important from a litigation perspective to show that the Board has adopted a well-developed, reasonable, and balanced rule. She also mentioned examples of such types of regulations from the California Privacy Protection Agency and the Bureau of Cannabis Control.

During the “*Rulemaking package review process*” section, board member, Dr. Minna Yoon, asked what the timeline was for a regulations package to be implemented. Ms. Schieldge advised that the APA gives agencies approximately 12 months to finish the process but could be as quick as 5 to 6 months under certain circumstances.

Finally, during the “*considerations*” section of the presentation, EO Mitchell inquired at what level should readability of the regulations be written as she was advised by another agency representative that regulations should be written at the eighth-grade level. Ms. Schieldge advised that the APA requires regulations to be written to the level of your regulated community (i.e., those persons who would be affected by the regulation), so it should be written in to meet the Board’s licensed professionals’ educational level (naturopathic doctors), but if you can make it simpler then that is always advisable. However, there is no law or regulation she is aware of that mandates that regulations be written at the eighth-grade level.

No further questions were asked. No public comments were made during this agenda item.

Agenda Item 8 Discussion and Possible Action to Initiate a Rulemaking and to Amend Title 16, California Code of Regulations Section 4240 Regarding Fees

EO Mitchell provided the report, which is included in the meeting materials. As Mr. Nishimine has stated in his Budget report, in 2018, it was identified that the Board had a structural imbalance in its Naturopathic Doctor's Fund ("Fund"), meaning that the Board was projected to run out of revenue to meet its operational needs. Legislation was enacted pursuant to Senate Bill 1480 ("SB 1480" -- Chapter 571 of the Statutes of 2018) to authorize fee increases to help ensure that the Board was able to meet its operational needs. Effective January 1, 2019, the Board implemented the provisions of SB 1480. SB 1480 amended the Board's fee structure to maintain the operation of the Board and restore funds in its reserve by increasing the application, initial licensing, and renewal fees, and establishing a fee for a certified license verification.

The Department of Consumer Affairs Budget Office (Budget Office) has since identified that the fees enacted by the 2018 legislation are no longer adequate to cover the Board's expenditures and do not address the increase in future operational costs. The Budget Office projects that the Board will deplete its existing revenue fund by Fiscal Year 2026-2027 and recommends increasing the Board's application, initial licensing, and renewal fees to help address these costs.

EO Mitchell explained that Regulations Counsel has provided information in the memo regarding the Board's fiduciary responsibilities that are required by law, including not allowing the Board to go insolvent.

Ms. Schiedge added that she requested that this information be placed in the meeting materials because the Budget Act provides that if the members do allow the Fund to go insolvent Board members and the Board's Executive Officer are personally liable for those excess costs. This highlights the importance of reviewing the Budget reports provided to the members at every board meeting to ensure solvency and avoid liability.

EO Mitchell continued with her report and explained that the Board's staff recently completed desk audits. The outcome of the desk audits confirmed that the actual costs to process and administer the Board's application, initial licensing fee, and renewals exceeds the current fees charged for these

categories as well as the statutory maximum. The attached document "Workload Cost Analysis" (Attachment 2) outlines the Board's current actual costs to process each application, initial license, or renewal.

Considering the foregoing, EO Mitchell requested that action be taken to address the pending structural imbalance for the Board's Fund through consideration of approval of Option 1 with an effective on filing date (which means the regulations would go into effect on the date approved by the Office of Administrative Law rather than quarterly). She presented the Board's options for action as provided in the meeting memo for this item. Regulations Counsel also recommended Option 1 and advised that it appears that without these increases it would mean that the Board would be in a more fiscally unstable position.

Mr. Nishimine stated the Budget Office does not make recommendations on what course to take to address solvency issues but tries to explain what would happen if the Board does not take any action. The Board will need to either seek legislative authority to increase caps (possibly at next Sunset), and reduce expenditures or both, and this current regulatory proposal is a stop gap measure to delay insolvency for one year, but it will not fully address the issues unless further steps are taken.

Board member Yam requested clarification regarding whether all fees were being raised to the caps or maximum. EO Mitchell confirmed that all fees are proposed to be raised to the maximums. Board member Yam also asked whether the statute adjusts for inflation, or would the Board have to keep coming back for increases to the cap. Regulations Counsel advised that in her experience, the Legislature does not generally allow authority to increase licensing fees based on inflation. She emphasized that this regulatory proposal is a short-term fix and not a long-term solution. A long-term solution would require further legislative intervention to request a fee cap increase. A possible opportunity for consideration could be at the Board's next Sunset review in 2026.

Mr. Nishimine was asked whether the Budget Office has done an analysis for what the caps might be for a future legislative proposal. Mr. Nishimine indicated he has not done that analysis. Options for the Board would include doing an internal desk audit, or a fee study to help make those determinations. Ms. Schieldge recommended that item regarding a future legislative proposal be placed on a future board meeting agenda for further discussion.

Chair Thompson noted that the motion in Option 1 includes an "effective on filing" directive so that the Board can begin to address the insolvency sooner than usual.

Board member Yam indicated that he was unaware of the liability aspects of the Board's Fund condition, but it is nonetheless critical to address these issues immediately. This is part of the Board members' fiduciary obligations as he sees it, and he will be recommending a future agenda item be brought back on possible legislative solutions to address long term solvency. It was also expressed that ND scope of practice issues should be a part of that discussion.

Mr. Nishimine stressed the importance of solvency, which allows the Board to continue to set standards for this profession and to have independence in discretion as to how you would like to regulate your community.

No public comments were made during this agenda item.

Motion – Thompson / Second – Davidson, to move approval of Option 1, which is to approve the proposed regulatory text and changes to 16 CCR 4240 as provided in Attachment 1 of the materials and direct staff to submit all approved text to the Director of the Department of Consumer Affairs and the Business, Consumer Services, and Housing Agency for review. If no adverse comments are received, authorize the Executive Officer to take all steps necessary to initiate the rulemaking process, make any non-substantive changes to the package, and set the matter for a hearing if requested. If no adverse comments are received during the 45-day comment period and no hearing is requested, authorize the Executive Officer to take all steps necessary to complete the rulemaking and adopt the proposed regulations at 16 CCR section 4240 as noticed with an effective on filing date. Roll call vote taken; motion carried 7-0-0. (YES – Thompson, Yoon, Singleton, Tais, Mukherjee, Yam, Davidson / NO – none / Abstentions – none).

Agenda Item 9 Status Update and Report on the Board's Current Rulemaking Proposals

EO Mitchell provided an update to the board's current Rulemaking proposals with the following anticipated target dates for providing a final draft of text:

Subject	Target Completion Dates
Name Change (Sec. 100)	4/30/2024 (text to Legal)
Delegation of Functions	06/20/2024 (initial filing to OAL)
Fees	ASAP

Inactive Status	Pending until September 2024
Retired Status	On Hold -- Pending Fee Package Completion
IV/Advanced Injection Therapies	12/20/2024 (anticipated final draft from working group)

No public comments were made during this agenda item.

Agenda Item 10 Federation of Naturopathic Medicine Regulatory Authorities Update (FNMRA) Update

EO Mitchell provided an update of the Federation of Naturopathic Medicine Regulatory Authorities (FNMRA), advising of the next meeting on May 1, 2024.

Further, EO Mitchell provided an update of the proposed statutory and regulatory changes surrounding naturopathic medicine and naturopathy happening in Idaho.

- Idaho has an existing board that licenses naturopathic doctors as Naturopathic Medical Doctors (NMD).
- The State of Idaho has created through legislation, a new board that would license naturopathic doctors (ND). However, the NDs of the new board would be one of six healing arts practitioners (MD, DO, Chiropractors, Podiatrists, Dentists, etc.) licensed under another medical profession, that choose to become an ND. These individuals would simply use their respective active license, and licensing examination administered by their respective healing arts professions as proof of competency. They would be required to take a continuing education-level, 160-180 hour naturopathy course to meet this requirement.
- There have been some proposals to have the unlicensable naturopaths, provide an examination that these new “ND” individuals would need to pass.
- In addition, the new board will register traditional lay naturopaths.
- The “NDs” from Idaho would have no reciprocity into California under BPC §3633 or under the Federal Military Portability Act since they are

not considered naturopathic doctors recognized in any other state regulating naturopathic medicine.

EO Mitchell was requested to provide the Idaho Department of Professional Licensing (IDOPL) with information including challenges that California has experienced with unlicensed activity, together with costs associated with enforcement and data of harm to consumers by unlicensed traditional naturopaths. Further EO Mitchell provided IDOPL with costs to create and fund a new regulatory board.

No public comments were made during this agenda item.

Agenda Item 11 Discussion and Possible Action on Prospective Legislative Proposals

The following possible legislative proposals are as follows:

a. Adding Peptides to Business and Professions Code §3640.7

This legislative proposal request was made by board member, Dr. Vera Singleton, N.D. during the 12/14/2023 board meeting.

EO Mitchell advised that “amino acids” are currently within the licensed NDs independent prescribing authority. Since peptides are the building blocks of an amino acid, the board may not need to seek any amendments to BPC §3640.7 but should carefully review this issue to see if clarifying regulations need to be proposed.

b. Other Legislative Proposals

This agenda item was tabled due to time allowance.

This agenda item will be discussed at length in a future meeting. No public comments were made during this agenda item.

Agenda Item 12 Discussion and Possible Action on Strategic Plan Amendment of Board Mission, Vision, and Value Statements

The Board discussed and decided to change current ***Mission statement*** to the following:

“To protect the health, safety, and wellbeing of Californians by licensing and regulating the practice of naturopathic medicine in a manner that supports access to safe high-quality care.”

Motion – Yam / Second – Davidson, to adopt the new Mission statement as amended during the meeting. Roll call vote taken; motion carried 6-0-0. (YES – Thompson, Yoon, Singleton, Tais, Davidson, Yam, Davidson / NO – none / Abstentions – none).

No public comments were made during this agenda item.

The Board discussed and decided to incorporate the following **Values** in the 2026 Strategic Plan:

- Access
- Collaboration
- Diversity, Equity, and Inclusion
- Integrity
- Quality Healthcare

The members requested to place the values in a format that would not make any value seen more important than another.

Motion – Thompson / Second – Yoon, to adopt the new values as amended during the meeting. Roll call vote taken; motion carried 6-0-0. (YES – Thompson, Yoon, Singleton, Tais, Davidson, Yam, Davidson / NO – none / Abstentions – none).

The Board discussed and decided to amend current **Goal Areas and Definitions** to the following:

- Licensing – The Board establishes and promotes licensing standards to protect consumers and allow reasonable access to naturopathic medicine.
- Continuing Education – The Board reviews and approves continuing education standards to promote excellence in the practice of naturopathic medicine.
- Enforcement – The Board prevents, reduces, or remediates unlawful or unsafe activities by licensed and unlicensed individuals that violate the practice act and pose a threat to the health, safety, or welfare of the public.

- Laws and Regulation – The Board reviews, amends, and creates laws and clarifying regulations to support its mandates and mission of consumer protection.
- Board Administration – The Board efficiently utilizes its resources and personnel through effective leadership to meet its objectives of excellent customer service.
- Stakeholder Outreach – The Board educates and engages stakeholders about the safe practice and regulation of naturopathic medicine.

Motion – Davidson / Second – Thompson, to adopt the new Goal Areas and Goal Definitions as amended during the meeting. Roll call vote taken; motion carried 6-0-0. (YES – Thompson, Yoon, Singleton, Tais, Davidson, Yam, Davidson / NO – none / Abstentions – none).

No public comments were made during this agenda item.

**Agenda Item 13 Discussion and Possible Action on Presentation
Regarding the American Association of Naturopathic
Physicians (AANP) Code of Ethics Draft**

Dr. Todd Robinson, ND, FABNO, AANP HoD Position Paper & Review Committee Chair, Florida Naturopathic Physicians Association President and Linn J. Wheeling, MBA, CAE, AANP Director of Community Engagement provided an overview of their new proposed Code of Ethics.

Dr. Robinson presented the new proposed Code of Ethics draft language. It was stated that the AANP would like to gather feedback from all states regulating the practice of naturopathic medicine. The link to the Code of Ethics draft was made available to the board members and will be available for at least the next 6 months or greater, to allow all stakeholder the opportunity to provide comments and feedback.

Board member Dr. Bruce Davidson asked if there would be a Code of Conduct available along with the Code of Ethics, since it seemed as though some of the former was taken out of the new draft Code of Ethics. Ms. Wheeling confirmed that this would be the case.

No public comments were made during this agenda item.

Agenda Item 14 Discussion and Possible Action on Updating Board Logo Color Design

This agenda item was tabled due to time constraints and will be added to a future meeting.

No public comments were made during this agenda item.

Agenda Item 15 Future Agenda Items and Next Meeting Dates

Items added for upcoming meeting:

- Discussion and Possible Action on Updating Board Logo Color Design
- Discussion and Action on AANP Code of Ethics Draft
- Potential Regulatory Proposal – Clarification on the prescribing and/or administration of peptides
- Budget – Potential Revenue Sources

The next meetings will be scheduled for 2024 using a poll to be sent out to members. No public comments were made during this agenda item.

Agenda Item 16 Adjournment

There being no further business or public comment, Dr. Thompson adjourned the meeting at 3:07 p.m.