

December 29, 2023

Melinda Grant, Undersecretary
California Business, Consumer Services and Housing Agency
500 Capitol Mall, Suite 1850
Sacramento, CA 95814

Dear Undersecretary Melinda Grant,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the California Board of Naturopathic Medicine submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2023.

Should you have any questions please contact Rebecca Mitchell, Executive Officer, at (916) 928-5862, Rebecca.Mitchell@dca.ca.gov.

GOVERNANCE

Mission and Strategic Plan

The California Board of Naturopathic Medicine's mission is to protect California health care consumers and expand access to safe and effective primary care by licensing and regulating Naturopathic Doctors through vigorous enforcement of the Naturopathic Doctors Act. To protect California health care consumers and expand access to safe and effective primary care by licensing and regulating Naturopathic Doctors through vigorous enforcement of the Naturopathic Doctors Act.

The Board's vision is to allow naturopathic doctors to practice to the full extent of their training and provide collaborative and crucial health care services to California Consumers. In addition, the values that we represent are:

1. Consumer Protection
2. Excellent Quality
3. Transparency
4. Integrity
5. Access
6. Collaboration

The Board's goals within our current strategic plan are:

- **Licensing:** The Board (formerly known as the Committee) promotes licensing standards for licensees to protect consumers and allow reasonable access to the profession. The Board also oversees and approves continuing education standards to promote excellence in practice and public safety.
- **Enforcement:** The Board protects the safety of consumers through enforcement of the laws and regulations governing the practice of naturopathic medicine.
- **Legislation and Regulations:** The Board's statutes, regulations, policies and procedures

strengthen and support their mandate and mission.

- **Administration:** Through effective leadership, the Board efficiently utilizes its resources and personnel to meet its objectives. It provides excellent customer service and consumer protection.
- **Outreach and Education:** The Board informs consumers, licensees, and stakeholders about the practice and regulation of the profession, while providing responsive customer service.

Control Environment

The Executive Officer (EO), Rebecca Mitchell, is responsible for the oversight and administrative operations of the Board and serves at the pleasure of nine (9) Board members. The Board members are appointed by the Governor, Senate Committee on Rules, and Speaker of the Assembly. There are no other members of a management team, therefore the EO is responsible for the recruitment and maintenance of a competent workforce and evaluating employees performance to enforce accountability through adhering to the personnel laws, policies, and procedures.

Information and Communication

The CBNM has several means to share information regarding operational, programmatic and financial decision making. The staff works closely with the executive officer (EO) and meets regularly to discuss areas of concern associated with internal and external risk to the board, staff performance, staff accountability, and fiscal matters. The EO also provides regular updates to the Board President regarding the budget, staff updates, industry and administrative concerns, and upcoming events relevant to the profession.

In addition, the Board is mandated to meet two (2) times a year within an appropriate location necessary to transact its business; however, the Board typically meets four times a year in a public setting to handle matters related to licensure, disciplinary actions, legislation, regulation, budget and a variety of other topics related to the status of daily operations.

MONITORING

The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the California Board of Naturopathic Medicine monitoring practices are implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Rebecca Mitchell, Executive Officer .

The CBNM's Administrative staff reports risks and risk management strategies to the EO. The following activities are performed to ensure internal controls are effective:

- EO meets regularly with staff to discuss daily operations and conducts annual one-on-one meetings with all staff.
- EO holds routine staff meetings and one-on-one meetings with all staff regarding performance and expectations.
- EO conducts continuous monitoring of processes and reconciles inefficiencies.

RISK ASSESSMENT PROCESS

The following personnel were involved in the California Board of Naturopathic Medicine risk assessment process: executive management, and staff.

The following methods were used to identify risks: brainstorming meetings, ongoing monitoring activities, other/prior risk assessments, external stakeholders, questionnaires, consideration of potential fraud, and performance metrics.

The following criteria were used to rank risks: likelihood of occurrence, potential impact to mission/goals/objectives, timing of potential event, potential impact of remediation efforts, and tolerance level for the type of risk.

RISKS AND CONTROLS

Risk: Inadequate Management-Level Staffing

The CBNM has 3.0 authorized positions, with one position being the EO. All program staff are responsible for effectively performing their assigned essential functions efficiently in support of meeting the Board's strategic mission goals and objectives. However, the Board lacks a second level manager or designee to perform delegated functions in the absence of the EO. As a result, the EO has limited ability to take vacation and/or use leave balances for both planned and unplanned absences.

Control: Add Management-level Staff

The EO will continue to meet with DCA leadership to discuss options to address the day-to-day management of staff and the delegation of duties in the EO's absence.

CONCLUSION

The California Board of Naturopathic Medicine strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

Rebecca Mitchell, Executive Officer

CC: California Legislature [Senate, Assembly]
California State Auditor
California State Library
California State Controller
Director of California Department of Finance
Secretary of California Government Operations Agency