

# Council on Naturopathic Medical Education Board of Directors Meeting

Sunday, May 26 – 27, 2018 ♦ 8:30 a.m. – 5:00 p.m.

Radisson Admiral Hotel ♦ Toronto, Ontario

## Call to order and roll call

Board vice president, Dr. Gregory, called the meeting to order at 8:35 a.m., and informed members that she would be chairing the meeting because Dr. Woolard was unable to attend due to a family emergency. The following Board members were present:

- Brian Andrew, JD, MA (Public Member), Chesterfield, Missouri;
- Sarah Beasleigh, ND (Institutional Member Rep., BINM), New Westminster, British Columbia;
- Jasmine Carino, ND (Profession Member), Toronto, Ontario;
- Margot Gregory, ND (Profession Member), Tucson, Arizona (board vice president);
- Arvin Jenab, ND (Profession Member), Costa Mesa, California;
- John Pecchia, CPA (Public Member), Poughkeepsie, New York;
- Leslie Solomonian, ND (Institutional Member Rep., CCNM), Toronto, Ontario;
- Eileen Stretch, ND (Profession Member), Tucson, Arizona;
- H. Garrett Thompson, DC, PhD (Institutional Member Rep., SCNM), Tempe, Arizona;
- Jamey Wallace, ND (Profession Member), Seattle, Washington; and

Members absent:

- Christina Woolard, ND (Profession Member), Murfreesboro, Tennessee (board president)

Staff present:

- Daniel Seitz, JD, EdD (executive director), Great Barrington, Massachusetts

Guests present during open session:

- Fraser Smith, ND (NUHS)

School representatives present during closed session to review NUHS substantive change application:

- Fraser Smith, ND, Assistant Dean of Naturopathic Medicine *and* an Associate Professor
- Randy Swenson, DC, MHPE, Vice President for Academic Services

School representatives present during closed session for hearing on BINM ND program reaccreditation:

- Michael Schanz, MBA, President
- Sarah Beasleigh, ND, Provost
- Shannon Svingen-Jones, MBA, Dean of Student Services
- Edward Hung, BA, BAccS(Hons), CPA, CGA, Chief Financial Officer

## Review of Board meeting agenda

There were no changes to the agenda.

## **Officer Reports**

### Secretary's Report

Council secretary, Dr. Carino, asked the board to review and approve the minutes from the last Council meeting.

Mr. Andrew moved, and Dr. Gregory seconded, the following motion:

**To approve the minutes of the October 16, 2016 Board of Directors meeting, as corrected.**

The motion was unanimously approved, with correction of typos.

### Vice President's Report

Council V.P., Dr. Gregory, stated that there was nothing to report since the last meeting.

### Treasurer's Report

CNME Treasurer, Mr. Pecchia, CPA, reported that FY 2017 was a successful year financially, as we ended the year once again with a small surplus (around \$15,000). So far in FY 2018, income and expenditure are tracking fairly closely to budget, and we're likely to have a small surplus for this fiscal year. Overall, we're doing well financially, which is why we've been able to keep the fees unchanged for several years, though we'll need to review the fees at the fall meeting.

### President's Report

Dr. Woolard was not present due to a death in the family.

### Executive Director's Report

Dr. Seitz reported the following:

- The CNME evaluation visit to BINM went smoothly. CNME board members, Drs. Woolard and Stretch, served on the team.
- The new CNME website seems to be functioning well so far, and we're regularly receiving email queries via the contact form
- Earlier this year, he attended two meetings of the Council on Higher Education Accreditation (CHEA) in Washington, DC, the focus of which was largely on Congressional initiatives to revise the higher education act. A number of changes that would impact the rules for USDE-recognized accreditors are being proposed. While some of the proposed changes might encourage useful innovation, there is a concern that, overall, the proposed rules will allow for a return of some of the financial abuses previously experienced in the for-profit higher education sector, lessen financial resources available to students enrolled in higher education programs, and weaken the rigor of the accreditation process.
- Four evaluation visits are coming up in 2018 and 2019: U. of Bridgeport, SCNM, Bastyr, and U. del Turabo.

## **Committee reports and action on committee recommendations**

### Executive Committee

Dr. Seitz reported on behalf of committee chair Dr. Woolard that the EC met to plan this meeting and discuss moving the CNME's reserves from the current CDARs accounts to higher yield, but still FDIC-insured, CDs. The

minutes of the meeting were included among the meeting materials.

#### Finance Committee

Committee chair Mr. Pecchia, CPA, stated that the committee did not meet since the last Council meeting.

#### Nominations Committee

Committee chair Dr. Gregory welcomed the new board members, Drs. Beasleigh and Jenab, and stated that she would provide an update on nominations matters later in the meeting.

#### Committee on Postdoctoral Naturopathic Medical Education

Committee chair Dr. Carino informed the board the CPNME would meet in the afternoon, so she will provide a report to the board tomorrow.

#### Audit Committee

Committee chair Mr. Andrew, JD, stated that for FY 2017, our CPA firm will conduct a review of the finances. Since we've used the same CPA firm for many years, we're planning on putting out an RFP for the FY 2018 audit; while we're happy with their services, it's a good practice to periodically check into using other firms.

#### Committee on Standards, Policies and Procedures

Committee chair Dr. Thompson stated that there is currently no business before COSPP, but noted that the board would be reviewing later in the meeting a document titled "Student Learning Outcomes in the Accreditation Process," which is a compilation of information on the student learning outcomes that various medical/healthcare accreditors track as part of the standards, policies and procedures.

#### Strategic Planning Committee

Dr. Seitz reported on behalf of committee chair Dr. Woolard that the final version of the strategic plan finalized in 2017 was included in the meeting materials as an FYI.

#### **Review of the document titled: "Student Learning Outcomes in the Accreditation Process"**

Dr. Seitz stated that in accordance with the CNME strategic plan, he hired a colleague to research how some of our peer programmatic accreditors in other healthcare/medical fields are currently addressing the issue of student/graduate learning and professional outcomes. As the Council has discussed on prior occasions, the USDE places a strong emphasis on outcomes, since it wants to make sure that federal money invested in higher education—whether in the form of grants or loans—is well spent, as demonstrated by positive outcomes.

Dr. Thompson stated that as educational delivery approaches become more varied (e.g., online/distance, blended, workforce training), specifying what even counts as credits or clock hours has become problematic. Educators need a way to determine that the education offered delivers the promised results, which explains the emphasis on assessment and outcomes. He noted that the University of Toronto medical school is experimenting with radically reducing the hours students spend in class—replacing class time with online and group work, and assessing student learning on a weekly basis. Dr. Carino offered to find out some more information on the U. Toronto model.

A number of observations were offered:

- Conventional medical schools rely on a lot of training taking place after the MD undergraduate training, while naturopathic schools need to ensure that students are ready for professional practice upon graduation since only a small number of NDs enter into residencies.
- Because of the nature of medical/healthcare practice, a purely online approach to education isn't feasible, but the hybrid model is entirely workable. Ironically, online/hybrid models can be more expensive to offer in practice.
- One thing the CNME does not require reporting on is ND employment following graduation. Should we ask for information on this? It was noted that there is some general data in on ND job placement and success, and that this would be a good topic to bring up in the context of the NCC and CNCC.
- Right now we ask for NPLEX results going back five years. Would it be useful to ask for the average exam results over the past five-year period (a "trailing average"), since there are sometimes anomalous results in a given year?

There was general agreement that we need to keep the conversations going regarding outcomes, benchmarks, assessing competencies, clock and credit hour requirements, etc. Also, we need to evaluate how any new CNME reporting requirements would impact school resources, since we need to be mindful that resources are limited.

### **Reports from other naturopathic organizations**

Board members and meeting attendee, Dr. Smith, provided updates on a number of naturopathic organizations as follows:

- **CCACO**: The Council of Chief Academic and Clinical Officers is currently addressing a number of areas, including: naturopathic competencies; code of ethics/boundaries; telemedicine; interprofessional education; vaccinations; the high cost of naturopathic education; sustainable development of the profession; pooling resources; and addressing the prevalent poverty mentality within the profession.
- **AANMC**: Hosted a meeting of NDs involved in naturopathic specialty education. AANMC executive director Dr. Yanez has been working in partnership with the residency directors to create a centralized residency application process.
- **AANP**: Is developing a position statement on vaccination. A draft statement has been circulated. Dan will contact AANP to see whether CNME can see statement.
- **U. of California-Irvine**: Dr. Jenab informed the board about the \$200 million donation to create the Susan Samuelli Integrative Health Institute with the school of medicine. A number of physician groups criticized the medical school for accepting this donation. California does not yet permit NDs to practice within their full scope, which may be connected with the relative lack of residency training.
- **CAND**: Shawn O'Reilly, executive director of the Canadian Association of Naturopathic Doctors, informed the board about the media/communications campaign and strategy developed by CAND to increase the visibility and acceptance of naturopathic medicine, and to address attacks on naturopathic medicine in a coordinated and strategic way.

She also informed the board about the decision of CONO (College of Naturopaths of Ontario, the provincial regulatory body) to develop its own licensure exam to be used in place of NPLEX, despite a

large number of Canadian naturopathic organizations questioning the wisdom of doing so. Among other things, she was concerned about the decision-making process; among other things, a letter from CAND to CONO signed by organizations questioning the decision, including the CNME, was not provided by the CONO director to the CONO board until after the board voted. Also, she is concerned that the exam will be geared towards CCNM curriculum, and that a number of NDs will be forced to take both this new exam and the NPLEX, depending on the requirements for licensure in other jurisdictions.

**[At 11:15 a.m. the board entered into closed session to address school-related matters]**

### **Review of the NUHS Substantive Change Request**

Dr. Gregory asked any board members with a conflict of interest, as defined by the CNME's conflict of interest policy, to leave the meeting room. Dr. Wallace recused himself from this item of board business due to a conflict of interest.

Prior to inviting school representatives into the closed session, the board reviewed the substantive change policy and the materials pertaining to NUHS's substantive change request to offer an ND bridge program under its auspices designed for DC students/graduates on the campus of the University of Western States.

Fraser Smith, ND (Assistant Dean of Naturopathic Medicine) and Randy Swenson, DC, MHPE (Vice President for Academic Services) were next invited into the closed session, and were given an opportunity to provide additional information on the substantive change application. Board members next had an opportunity to ask questions. Following this discussion, Drs. Smith and Swenson left the meeting room and the board entered into deliberation.

Dr. Gregory, ND, moved, and Mr. Andrew, JD, seconded, the following motion:

- 1. To inform NUHS that the CNME policy on branch campuses (see page 95 of the *CNME Handbook of Accreditation for Naturopathic Medicine Programs*, 2017 edition) applies to the NUHS proposal to offer a bridge ND program located on the campus of the University of Western States for UWS DC program students and graduates, and thus NUHS must submit the information and documentation required under that policy.**
- 2. To defer a decision on the NUHS substantive change request regarding the UWS campus-based bridge program pending receipt of the following materials/information:**
  - a. The information/materials required under the CNME policy on branch campuses.**
  - b. A gap analysis/curriculum map that demonstrates that all of the required competencies for the current NUHS ND program are covered by and aligned with the proposed required and exempted coursework for the proposed UWS bridge program. (Note that the gap analysis/curriculum map must demonstrate that the full depth and breadth of the program content of the current NUHS ND program is contained in the UWS bridge program; if this is not the case, then NUHS should revise the bridge program accordingly.)**
  - c. Specific information on how course sequencing and pre-requisites for specific courses will differ between the current ND program curriculum and the proposed bridge program curriculum, and an analysis of why the differences in sequencing and pre-requisites will not have an adverse impact on the delivery of course material.**
  - d. Will the same clinic requirements, policies, procedures, patient forms, student evaluation forms, etc., be used for both the regular ND students at NUHS and the UWS DC students/graduates enrolled in the bridge program? If not, provide detailed information and documentation on any differences and the justification for these differences.**
  - e. Provide information on the faculty who will teach in the UWS campus-based bridge program,**

- including credentials and pertinent teaching and other professional experience.
  - f. Provide detailed information on how the bridge program will be administratively staffed, including how, where and by whom academic and student services will be provided.
  - g. Provide detailed information on the facilities and other physical resources that will be provided by UWS.
  - h. Provide information on the role that the current ND faculty played in developing the bridge program. In particular, have the ND faculty indicated in any way their approval of the bridge program as delivering a depth and breadth of training comparable to the regular ND program?
3. To inform NUHS that, under the CNME substantive change policy, (i) NUHS is required to submit a substantive change application to offer a bridge program at the NUHS campus for DC students/graduates of UWS (see page 27 of the 2017 edition of the *CNME Handbook of Accreditation for Naturopathic Medicine Programs*, where it states that “the offering of a different program format for students from other healthcare professions” is one of the circumstances under which a substantive change application must be submitted prior to the change being made), and (ii) that since NUHS did not submit a substantive change application regarding the NUHS campus-based bridge program for UWS DC program students/graduates advertised on its website, the program advertised on its website is neither allowed nor accredited by the CNME. (Note that should NUHS choose to submit a substantive change application to the CNME for permission to offer the NUHS campus-based bridge program advertised on its website rather than discontinue it, the required information/materials for the proposed UWS campus-based bridge program set forth above should serve as a guide for the NUHS campus-based bridge program substantive change application.)

The motion was unanimously approved.

### Review of BINM ND program for Reaccreditation

Dr. Gregory asked any board members with a conflict of interest, as defined by the CNME’s conflict of interest policy, to leave the meeting room. Drs. Jenab and Beasleigh left due to a conflict of interest.

The board had a preliminary discussion on this agenda item, and then invited BINM representatives to participate in a reaccreditation hearing. The BINM representatives in attendance were:

- Michael Schanz, MBA, President
- Sarah Beasleigh, ND, Provost
- Shannon Svingen-Jones, MBA, Dean of Student Services
- Edward Hung, BA, BAccS(Hons), CPA, CGA, Chief Financial Officer

After introductions, the BINM representatives were invited to address any of the findings from the evaluation visit and any other matters of interest. Next, Council members asked representatives questions regarding the team’s findings as well as general questions about BINM. Upon completion of the Q & A portion of the hearing, the BINM representatives left the meeting room, and the Council reviewed and discussed the evaluation team recommendations, BINM’s formal response, and new information presented. Based on their review, the Council made a decision regarding reaccreditation of the BINM ND program.

Dr. Stretch moved, and Dr. Carino seconded, the following motion:

- **Defer a decision on reaccreditation of the ND program for a period of six months (i.e., until the next Council meeting, which is scheduled for Oct. 14, 2018).**
- **To require BINM to provide to the Council the following information/materials by Sept. 15, 2018:**
  - **FY 2018 year-end audited financial statement (if the audited statement is not available, an unaudited statement is acceptable—and the audited statement should be supplied as soon as**

- it becomes available);
- **Current admissions data for the 2018 – 2019 academic year (i.e., total enrollment and enrollment by year), and a comparison of total enrollment with the previous academic year;**
- **An updated budget for FY 2019 based on current enrollment data;**
- **Detailed information on any new campus facility that BINM has leased or purchased, including information on any construction/renovation projects planned and/or in process and on associated projected expenditures; and**
- **Information and documentation related to the sale and/or lease of BINM’s current campus facility.**
- **To maintain in effect the outstanding letter of advisement pending the Council’s review of the above information and materials at the October 14, 2018 meeting.**

The motion was unanimously approved.

### **Review of annual and focused reports**

Prior to the review of individual annual and focused reports, the Council discussed the report review process, and how to address board member conflicts of interest (COIs). Regarding COIs, the Council agreed as follows:

- Individuals who have a past involvement with an institution may remain in the meeting room, but should neither participate in discussion nor vote on any decision.
- Individuals who are currently employed by—or have some other current involvement with—an institution must leave the meeting room for the entire review process.

There was some general discussion on the content of the annual reports that were submitted:

- It was noted that some programs are providing what seems like far more information than is either requested or needed for the sake of assessing whether a recommendation/area of interest has been adequately addressed. The board asked Dr. Seitz to try to develop some guidelines to lessen somewhat the amount of information and documentation that may be provided.
- While at times an excessive amount of information is provided, at other times there is a lack of evidence for determining whether a recommendation or area of interest has been adequately addressed. Dr. Seitz will work with the CNME administrative assistant and lead reviewers to address this issue.
- There is some variation in what the schools are supplying in regard to NPLEX information; it would be better if the information could be standardized, perhaps by providing a template. The following information would be useful to the board when reviewing individual school NPLEX results: (i) the all-school average for each exam administration, and (ii) the number of examinees for each individual school for each exam administration, since sometimes the number is too low to have any statistical reliability. It was agreed that the board needs to clarify the annual reporting requirement for NPLEX scores (e.g., five-year average); we’ll review this at the fall 2018 meeting.
- It might be helpful to ask schools to analyze trends that might be concerning. For example, if exam results or financial resources are trending downward, that might trigger an analysis. This would need to be defined carefully, since there can be a downward trend, but nonetheless no current concerns.
- Currently, the annual report form asks for submission of the ND program budget for the current fiscal year and previous fiscal year. The question was raised: Would it be useful to request submission of a budget-to-actual finance report for the program budget for the previous fiscal year?

### **UBCNM**

Dr. Gregory informed the board that she had a conflict of interest based on past employment. Dr. Carino, the lead reviewer, provided the following summary to the board based on the review team’s review:

- There are currently no outstanding findings, and nothing in the report indicates any potential compliance issues;
- UBCNM provided useful survey info; and
- There's been a downward trend in NPLEX I scores since 2016, though this is not yet problematic.

Mr. Pecchia, CPA, noted that the annual report did not include the required FY 2017 audited financial statement. Dr. Seitz will request that this be provided.

### **NUNM**

Dr. Gregory informed the board that she had a conflict of interest based on past employment. Dr. Thompson, the lead reviewer, provided the following summary to the board based on the review team's review:

- Based on the documentation provided, the review team considers the one outstanding recommendation (pertaining to Standard VII) as having been satisfactorily addressed; for this reason, the review team suggests that the board remove it.
- There has been a significant decrease in enrollment and a consequent downward trend in revenues; CNME should, therefore, monitor their finances closely. Mr. Pecchia, CPA, agreed that the financial trend was concerning, though not yet at a non-compliant level.

Dr. Stretch moved, and Mr. Pecchia, CPA, seconded, the following motion:

- **Remove Recommendation VII-1.**
- **Add a new area of interest as follows: Area of Interest III-1: The Council is concerned that the recent downward trend in enrollment in the ND program could, if it continues, adversely impact the institution's financial well-being. (Std. III, B.1)**
- **Require a focused report by Sept. 15, 2018—to be reviewed at the fall 2018 CNME board meeting—on the institution's projected financial situation for FY 2018 – 2019, including:**
  - **The following ND enrollment data for the 2018 – 2019 academic year: total enrollment and enrollment by year; and a comparison of total enrollment for the 2018 – 2019 academic year with the previous two academic years;**
  - **An analysis of the institution's financial situation in light of total enrollment for the 2018 – 2019 academic year; and**
  - **The FY 2018 year-end financials (an unaudited statement will be sufficient if the audited statement is not yet available).**

The motion was unanimously approved (with Dr. Gregory abstaining).

### **NUHS**

Dr. Solomonian, the lead reviewer, noted that the review team was concerned about the relatively low recent pass rates on the NPLEX. The team suggests that the board revise or eliminate a number of outstanding recommendations and areas of interest; these are listed in the following motion adopted by the board.

Dr. Carino moved, and Dr. Gregory, seconded, the following motion:

- **To maintain in effect Recommendation VI-1.**
- **To remove the following recommendations: Rec. IV-2, Rec. IV-3, and Rec. VI-2.**
- **To change the following recommendations into an area of interest: Rec. IV-1, Rec. VII-1 and VII-2.**
- **To remove all of the areas of interest with the exception of Area of Interest IV-5 and Area of Interest X-1.**

The motion was unanimously approved.

## **CCNM**

Drs. Solomonian and Carino both recused themselves from the review of CCNM's annual report due to being current employees, and left the meeting room. Dr. Gregory, the lead reviewer, informed the board that there was only one outstanding recommendation pertaining to Standard III and no outstanding areas of interest, and asked Mr. Pecchia, CPA, to provide feedback to the board on CCNM's financial situation and suggestions regarding the outstanding recommendation and current outstanding letter of advisement due to the Council's concerns over CCNM's financial soundness as an institution. Mr. Pecchia, CPA, stated that the financial information from FY 2017 indicated that the institution was still weak.

Dr. Stretch moved, and Dr. Jenab, seconded, the following motion:

- **Maintain Recommendation III-1 in effect**
- **Maintain the outstanding Letter of Advisement in effect**
- **Require submission by September 14, 2018, of a focused report on CCNM's continued efforts to address its financial weaknesses; the report should include the following information:**
  - **FY 2018 year-end financial statement (unaudited is acceptable)**
  - **2018-2019 academic year enrollment and how that compare with 2017 – 2018 enrollment, and the impact on budget**
  - **A detailed report on which positions were eliminated in the past 12 months, how job functions have been redistributed among the remaining positions, what new systems have been put in place to support the reduction on staffing, and the status of the sale of portion of land and its effect on the institution's financial situation.**

The motion was unanimously approved.

## **Universidad del Turabo**

Dr. Wallace, the lead reviewer, presented the review team's suggestions to the board. It was noted that NPLEX exam scores are still an issue, though small examination cohorts on occasion make it difficult to assess statistical significance. Dr. Seitz informed the board that the evaluation visit for initial accreditation of UT's ND program is anticipated for early fall of 2019.

Dr. Thompson moved, and Dr. Gregory, seconded, the following motion:

- **To maintain in effect the following recommendations: Rec. VI-1, Rec. VI-3, and Rec. VII-1**
- **To remove the following recommendations: Rec. IV-1, Rec. IV-2, Rec. IV-3, and Rec. VI-2.**
- **To change Recommendation VI-4 and VI-5 into areas of interest.**
- **To remove all areas of interest with the exception of Area of Interest III-1 and Area of Interest VI-1.**
- **To request that the program provide information on its plans to revise the curriculum in order to determine whether the planned changes may warrant submission of a substantive change report.**

The motion was unanimously approved.

## **SCNM**

Dr. Thompson recused himself from the review of SCNM's annual report due to being current employee and left the meeting room; Dr. Gregory informed that board that she had a conflict of interest due to past employment. Dr. Jenab, the lead reviewer, informed the board that there was only one outstanding area of interest, and that the review team suggested removing it based on the information provided.

Dr. Jean moved, and Dr. Solomonian, seconded, the following motion:

- **To remove Area of Interest VI-1.**

The motion was unanimously approved.

### **Bastyr University**

Dr. Beasleigh, the lead reviewer, informed that board that there are currently no outstanding findings, and that the review team found nothing in the report that indicated any potential compliance issues.

**[At 4:35 p.m., the board entered into back into open session to address the remaining agenda items]**

### **Nominations Committee**

Committee chair Dr. Gregory provided an update on Council membership as follows:

- Dr. Solomonian's institutional member representative term will end at the completion of the fall 2018 meeting. It is NUHS's turn (first time) to nominate an institutional member rep. Dr. Seitz will contact NUHS to invite them to nominate a candidate.
- The Council's bylaws specify that we have 2 or 3 public members. Currently, we have 2 public members, which means that we have an open position. There is no need to rush to fill it; however, we will start looking into potential candidates.
- The Council's bylaws specify that we have 4 – 6 profession members. Currently there all six member positions are filled; however, Dr. Carino's second and final term will end at the completion of the fall 2018 meeting. Similar to the public member position, there is no need to rush to fill it; however, we will start looking into potential candidates.

### **Committee on Postdoctoral Naturopathic Medical Education**

Committee chair Dr. Carino stated that the CPNME had a very productive meeting the previous day. A large portion of the meeting was devoted to clarifying internal CPNME procedures, such as residency program reporting deadlines and the residency site review process. Additionally, the CPNME reviewed a request from the Oncology Association of Naturopathic Physicians (OncANP) that the CNME/CPNME explore the possibility of working with the OncANP to establish standards for a specialty residency program in naturopathic oncology with the ultimate goal that the Council would be involved in approving specialty residencies. The CPNME identified a number area/issues where it needs additional information in order to decide whether this would be reasonable and practical for the Council to undertake this responsibility. For complete details on topics discussed and decisions made during the CPNME meeting, Council members should refer to the CPNME meeting minutes.

### **Date and site of the fall 2017 Council meeting**

Dr. Seitz stated that Dr. Woolard and he have identified a number of potential dates for the fall 2017 meeting, and that the board will be sent a link to a Doodle poll to provide information on their availability. The meeting will likely be on somewhere in the southeast of the U.S.—possibly Nashville or Charleston—depending on the cost of lodging and meeting space.

The meeting adjourned at 6:00 p.m.