

Council on Naturopathic Medical Education Board of Directors Meeting

Thursday, May 13, 2021 ♦ 11:00 a.m. – 7:00 p.m. EDT

Friday, May 14, 2021 ♦ 11:00 a.m. – 7:00 p.m. EDT

Virtual Meeting Via Zoom

MEETING MINUTES

Call to order and roll call

CNME board president Dr. Wallace called the meeting to order at 11:38 a.m. ET. The following Board members were present:

- Amanda Alexander, ND, MEd (Profession Member), Mesa, Arizona;
- Brian Andrew, JD, MA (Public Member), Chesterfield, Missouri;
- Arvin Jenab, ND (Profession Member), Costa Mesa, California;
- Joni Olehausen, ND (Profession Member), Dayton, Ohio (board vice president);
- Eileen Stretch, ND (Profession Member), Tucson, Arizona (board secretary);
- Randy Swenson, DC, MHPE (Institutional Member Rep., NUHS), Lombard, Illinois;
- Cynthia Hope, ND Bastyr U. (Institutional Member Rep., Bastyr U.), San Diego, California;
- Susan Tebb, PhD, MSW, C-IAYT, RYT-500 (Public Member), St. Louis, Missouri;
- Marcia Prenguber, ND, FABNO (Inst. Mem. Rep., U. Bridgeport), Bridgeport, Connecticut
- Jamey Wallace, ND (Profession Member), Seattle, Washington (board president); and
- Melissa Woodin, CPA, MBA (Public Member), Kent, Connecticut (board treasurer)

Staff present:

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

Review of Board meeting agenda and Zoom meeting protocols

There were no changes to the agenda.

Officers' and Executive Director's reports:

Secretary's report

CNME Secretary, Dr. Stretch, noted that there were two sets of board meeting minutes for the board to review and approve, and asked board members to provide any corrections or additions before each vote was taken.

Mr. Andrew, JD, MA moved, and Ms. Woodin, CPA, MBA, seconded, the following motion:

To approve the minutes of the November 7 – 8, 2020 Board of Directors meeting, with a corrected list of meeting participants.

The motion was unanimously approved, with one abstention.

Dr. Tebb moved, and Dr. Olehausen seconded, the following motion:

To approve the minutes of the January 24, 2021 Board of Directors meeting, with a corrected list of meeting participants.

The motion was unanimously approved.

President's report

CNME President, Dr. Wallace, informed the board that Dr. Seitz and he had represented CNME at the US Dept. of Education/National Advisory Committee on Institutional Quality and Integrity (NACIQI) re-recognition hearing in March, and shared his impressions of the hearing process (overall positive, but some persistent questioning of CNME's federal links by one NACIQI member). He also mentioned that the Council of Chief Academic and Clinical Officers (CCACO), a committee under the Association of Accredited Naturopathic Medical Colleges (AANMC), was continuing to work together to address ongoing challenges presented by the Covid situation, and was also engaged in addressing the questions that COSPP had posed to AANMC/CCACO regarding potential revisions to CNME's Program of Study standard (Standard VI). The schools have appreciated the CNME's willingness to work collaboratively with AANMC to address ongoing challenges. Finally, he noted that the Executive Committee had met on a couple of occasions to plan upcoming board meetings and discuss options for revising the executive director annual performance review process.

Vice-President's report

CNME Vice-President, Dr. Olehausen, noted that in her VP capacity, she is designated to serve as an interim executive director in the case of an emergency situation. She reported that she had met with Dr. Seitz and CNME administrative assistant, Michelle Manto, for an orientation session on how CNME functions administratively.

Treasurer's report

CNME Treasurer, Ms. Woodin, CPA, MBA, presented the FY 2020 year-end finance report and the FY 2021 first quarter (i.e., 3/31/2021 budget-to-actual report). She noted that there was a fairly large surplus in 2020 due, in part, to the CNME meeting virtually instead of in person.

For FY 2021, fee income will be less than budgeted due to the merger of BINM and CCNM, since BINM is now considered a branch campus of CCNM (CNME charges a lower base fee amount for an ND program delivered at a branch campus than the ND program delivered at the parent campus). However, since this spring CNME board meeting is being held virtually, we are still likely to have a financial surplus in FY 2021.

Executive Director's report

CNME Executive Director, Dr. Seitz, noted that we are still waiting to receive from the U.S. Secretary of Education the final decision on CNME's re-recognition application. Since the USDE staff reviewer and

NACIQI have both recommended that CNME be re-recognized for the maximum period of five years, we expect to receive a positive decision from the Secretary of Education. One thing that came out of this process is that CNME-accredited ND programs need to make sure that they apply for funding from the federal programs that constitute the CNME federal links; if they don't, that could imperil CNME's recognition status in the future.

Dr. Seitz also noted various projects and tasks on the horizon, including:

- Creating members' only sections of the CNME website for board members and site visitors.
- Complete work on the operations manual, incorporating the new website members' only sections.
- Plan reaccreditation site visits to NUNM, NUHS; provide accreditation self-study workshops for school staff members.
- Plan the focused site visit to the WA and CA campuses of Bastyr University.
- Plan the follow-up in-person visit to UAGM.
- Work with several schools, AANP and AANMC to strengthen utilization of the federal links for purposes of ongoing USDE recognition; touch base with legal counsel on technical questions regarding federal link status.
- Continue COSPP work on Standard VI (and possibly include a review of Standard VII).
- Continue CPNME work on residency competencies.
- Work with the Nomination Committee to identify potential board candidates.
- Work with the Strategic Planning Committee to begin a new round of strategic planning.
- Develop options for the board to conduct the ED performance review.
- Review with the board the option of adopting the Policy Governance model.

Committee and other reports; action on committee recommendations:

Executive Committee

Dr. Wallace, chair of the EC, reiterated that the EC had a met couple times, both to plan this board meeting and to consider options for conducting the ED performance review process, and noted that EC meeting minutes were provided with the materials for this meeting.

Finance Committee

Ms. Woodin, CPA, MBA, chair of the Finance Committee, stated that the committee had met to consider whether to increase CNME's annual accreditation fees for FY 2022 and to come up with options. She presented financial projections regarding CNME's fee income over the next several years, which take into account that the teach-out of U. Bridgeport's ND program will be completed as of May 2022 and BINM is now a branch campus of CCNM. While these changes will reduce revenue, the reductions can be offset by gradual fee increases combined with possibly moving to meeting in person once a year instead of twice. CNME's large financial reserve provides a buffer that would allow for gradual fee increases and for operating with a deficit for a few years, if needed.

Ms. Woodin CPA, MBA, also provided a summary of how the institutions offering CNME-accredited ND programs are doing financially, based the review conducted by her and Mr. Andrew, JD, MA, of the

financial information provide with the annual reports. Basically, three institutions—NUHS, UAGM and SCNM—operated with a surplus in FY 2021, while the other institutions had deficits. Generally, the institutions that operated with deficits are strong enough in terms of their assets to not be in any immediate danger of experiencing financial exigencies. In the case of U. Bridgeport, their financial condition is not an issue since Goodwin University, which is taking over the ND program for the final year, is in strong financial shape. CCONM gained reserves by virtue of merging with BINM, but will need to generate reserves operationally moving forward.

Ms. Woodin, CPA, MBA, next presented the committee's proposal regarding the 2022 fees. The committee is proposing keeping the base fees unchanged and increasing the per student FTE fee by \$2. This change would only result in an increase in fees next year in the case of programs that experience an overall increase in their FTE number as of fall 2021.

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

To adopt the accreditation fees proposed by the Finance Committee for 2022, namely to increase the per FTE fee by \$2.00 and to keep all of fees unchanged.

The motion was unanimously approved.

Nominations Committee

Dr. Wallace, chair of the Nominations Committee, reported that there is one current vacancy on the board in the profession member category, and there will be a second profession member vacancy coming up when Dr. Wallace's term ends in fall 2021. Since the CNME bylaws require the board to have 4 – 6 profession members at any time, and we currently have five, there is no need to rush to fill these vacancies. However, now is the time to seek out potential new profession members. Dr. Wallace invited current CNME members to send Dr. Seitz any recommendations they might have concerning NDs who they feel think would be worthwhile to consider for CNME membership. Dr. Seitz will also be contacting stakeholder groups, such as AANMC, AANP, CAND and others to ask for recommendations. Once we have several potential candidates, the nominations committee will meet to preliminarily review them and plan next steps. It was suggested that we need to identify some Canadian candidates, since there are currently no board members who live in Canada (though there is one member who is a Canadian citizen). The question was asked: Are there any particular skills or credentials we're looking for in a profession member? Dr. Wallace stated that there are no specific skills or credentials that the CNME has identified, but generally speaking we look for NDs with other relevant experience in addition to clinical practice, whether it might be teaching, having experience with accreditation, having experience serving on non-profit boards, having participated in residency training, etc. Dr. Seitz stated that it's also good to seek balance on the board, whether it's having some newer practitioners in addition to seasoned practitioners, some Canadian practitioners, and so on; also, it's essential to find people who work well in groups.

Dr. Wallace stated that later in the meeting the Board will need to review Dr. Prenguber's status as an institutional member representative, since her position as director of the U. Bridgeport ND program is being eliminated as of the end of this June.

Committee on Postdoctoral Naturopathic Medical Education

Dr. Stretch, chair of the CPNME, reported that the committee had met recently and the minutes of the meeting were included with the materials for this meeting. Committee members spot-checked the materials uploaded to the residency database for three individual residency sites for each of the four schools that are recognized residency sponsors to make sure that the schools' materials are up-to-date. Generally speaking, except for a couple of the documents, the materials were up-to-date. Dr. Stretch also reported that the residency competencies taskforce, which had postponed its work due to Covid-related challenges, would resume its work soon.

Committee on Standards, Policies and Procedures

Dr. Olehausen, chair of COSPP, reported that COSPP had met recently to brainstorm possible revisions to Standard VI (Program of Study) based on the experiences of ND programs this past year adapting to the Covid situation, and noted that minutes of the meeting were included with the materials for this meeting. The meeting included people from the schools and AANMC, and there was a lot of excellent discussion on topics such as telehealth, how to ensure academic honesty in the context of online learning, whether specific bright-line hours requirements or limits are needed, and so on. The committee came up with a number of questions for AANMC/the school community based on the discussion. COSPP is planning on having a follow-up meeting once it receives feedback on these questions. Dr. Prenguber stated that within AANMC/CCACO, there have been a lot of robust discussions on various topics related to ND training, including the role of telehealth, the use of synchronous online instruction vs. asynchronous, and the degree to which competencies can be used to define ND education in place of specifying hours and/or subject matter. Board members offered comments on how prescriptive CNME should be versus providing flexibility.

Audit Committee

Mr. Andrew, JD, MA, chair of the Audit Committee, noted that for FY 2020, CNME will arrange for a review of its financial statements, since we had an audit conducted for FY 2019.

Strategic Planning Committee

Dr. Wallace, chair of the Strategic Planning Committee, stated this summer would be a good time to initiate a new round of strategic planning.

Reports from other naturopathic organizations

Dr. Wallace reiterated that CCACO has been meeting regularly and that the schools have been appreciative of the flexibility that CNME has provided. They are also in the process of addressing the questions raised by COSPP.

Dr. Olehausen, who served as CNME's representative on the board of the Academic Collaborative for Integrative Health (ACIH), reported that ACIH has merged with the Academy of Integrative Health & Medicine (AIHM), which has a similar mission. Tabatha Parker, Executive Director of AIHM, is an ND.

Review and update (if needed) the most recent temporary emergency policy re Covid

The board reviewed the most recent temporary emergency policy re Covid, which is contained in a CNME memo to the schools dated December 15, 2020. This memo provided flexibility in delivering ND programs utilizing telehealth and online delivery through June 30, 2021. CNME members who work at schools stated that, generally speaking, faculty, staff and students are eager to return to campus. However, given the continuing uncertainty of these times and the need for sufficient lead-time to plan ahead, schools ideally need the flexibilities extended to cover the entire 2021 – 2022 academic year. The board agreed to extend flexibilities as follows:

- To extend the flexibilities on the same terms as before through the 2021 – 2022 academic year (i.e., until June 30, 2022);
- To require schools to return to normal operation as soon and as quickly as practicable, given the constraints of their local jurisdictions;
- To require submission of two reports:
 - The report due September 30, 2021, referenced in the 12/15/2020 memo to the schools, including (i) specific information on how the school is handling clinical interactions broken out by telehealth, simulated cases and in-person cases, and covering the 2020 – 2021 academic year, (ii) a description on anticipated continued modifications for the 2021 – 2022 academic year, if any; and
 - A brief update along with the annual report due in January 2022 asking for the same information as was required for the update due in January 2021.

Dr. Seitz will draft a memo to the schools for review by the Executive Committee. Following the EC review, Dr. Seitz will circulate the draft memo to the full board for review and approval.

Update on U. Bridgeport's teach-out process/Dr. Prenguber's contract with UB

(Dr. Prenguber was not present during this agenda item.) Dr. Seitz noted that the 2021 – 2022 academic year would be the final year of the U. Bridgeport ND program teach-out. Dr. Seitz also noted that Dr. Prenguber, who has been serving as the dean of the U. Bridgeport ND program, informed the CNME recently that her current contract would only be effective through June 30, 2021, and would not be renewed by the institution taking over the program, namely Goodwin University (this institution is taking over control of the program for the remaining year due to the fact that UB, in essence, is going out of business and transferring its programs to other institutions in Connecticut). While it is unfortunate that Dr. Prenguber's contract is being terminated prior to the completion of the teach-out process because of her thorough knowledge of the program, Dr. Prenguber believes that Goodwin University will honor the teach-out plan that the CNME board approved and will ensure reasonable program quality during the final teach-out year.

Since Dr. Prenguber serves as an institutional member representative nominated by UB, the board needs to decide what her status as a CNME board member should be following June 30, 2021, when her contract comes to an end. Dr. Seitz stated that this is a one-of-a-kind situation for which there is no CNME precedent. After discussion of various options, the board agreed that since it had previously decided that Dr. Prenguber's term would continue for the normal 3-year term allotted to institutional member representatives even though the UB ND program would end sooner than the end of the 3-

year term, it would invite Dr. Prenguber to serve for the full three years, if she wished. Dr. Prenguber indicated subsequently that she would accept the board's offer to complete the 3-year term.

Review of 2019 Annual Reports of ND Programs, including review of updates from programs regarding coronavirus-related accommodations/changes

Dr. Seitz reminded the Board of CNME's process for reviewing annual reports:

- A review team of two board members is responsible for (i) reviewing each ND program's annual report for completeness and responsiveness, (ii) making a recommendation regarding whether the program in question has satisfactorily addressed outstanding recommendations and areas of interest, and (iii) if applicable, making a recommendation for other board action. Dr. Seitz noted that he also reviews annual reports and is available to assist teams.
- This year, CNME required accredited/candidate ND programs to submit along with the annual report an update on the temporary accommodations/changes to their curriculum and/or program delivery they made to address the challenges presented by the coronavirus situation. Review teams were asked to make sure that any temporary measures were in accordance with the temporary coronavirus policies adopted previously by the CNME board.
- Any board member that is currently employed by or otherwise involved with an institution must recuse himself/herself from the meeting while the annual report is reviewed. Other board members who may have a conflict of interest, as defined by the CNME Conflict of Interest policy, but who do not have a current involvement with the institution, do not need to recuse themselves, but should refrain from participation in the review process.

University of Bridgeport

Dr. Prenguber, who has a current conflict of interest, recused herself from review of UB's annual report.

Dr. Jenab, chair of the review team, stated that the team found the report to be complete and responsive, and that the coronavirus report complied with CNME's temporary policies. He noted that there currently is only one outstanding recommendation for the UB ND program, name a requirement that the ND program be given access to an electronic health records system. Even though this is still an outstanding finding that has not been fully addressed, the team recommends taking no action on this finding, since the program is entering the final year of the teach-out process; this means that the issue of access electronic health records system will be moot as of May 2022, when the last of the students graduate.

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

To accept the recommendations of the UB annual report review team.

The motion was unanimously approved.

Dr. Prenguber rejoined the meeting.

National University of Natural Medicine

No board members had a conflict of interest.

Dr. Jamey Wallace, chair of the review team, stated that the team found the report to be complete and responsive, and that the coronavirus report complied with CNME's temporary policies. Since there are no outstanding findings related to NUNM, no board action is required. However, he noted that NUNM may have been 67 hours short in terms of the most recent graduating class meeting the 1,200-hour clinical treatment requirement; this should be noted in the letter to the school regarding the annual report.

Dr. Wallace moved, and Dr. Olehausen, seconded, the following motion:

To accept the recommendations of the UB annual report review team.

The motion was unanimously approved.

National University of Health Sciences

Dr. Swenson stated that he has a current conflict of interest and recused himself from review of NUHS's annual report.

Dr. Stretch, chair of the review team, stated that the team found the report to be complete and responsive, and that the coronavirus report complied with CNME's temporary policies. Dr. Stretch also stated that the team recommends to the board that it maintain in effect the Area of Interest VII-2 and remove Area of Interest X-1. Dr. Seitz reminded the board that an area of interest is not considered a finding of non-compliance or insufficient compliance with CNME accreditation standards; rather, it's a weakness that should be addressed.

Additionally, the review team noted (as did NUHS in its report) that NUHS's NPLEX scores have been below the average score and on something of a downward trend. Moreover, in the last couple of years the scores have fallen below the CNME benchmark. In its report, NUHS provided an analysis of the exam result and some steps its planning on taking. The review team recommended that a new Area of Interest be added as follows: "Given the recent overall downward trend of NPLEX exam results and that the results have fallen below the CNME benchmark, NUHS needs to continue to investigate the factors that may have contributed to the exam results, including the following: (i) whether having certain classes shared between ND students and students in other degree programs may have an adverse impact of NPLEX exam results due to insufficient coverage of some material needed for success on NPLEX; (ii) what factors, if any, may impede identification of students with academic deficiencies in regard to the content of the NPLEX prior to their taking the exam so that the deficiencies can be addressed in a timely manner (e.g., Is there an assessment issue?); and (iii) whether more attention needs to be paid to the NPLEX exam blueprint to ensure that course curricula cover material essential for NPLEX success."

Dr. Stretch moved, and Mr. Andrew, JD, MA, seconded, the following motion:

To accept the recommendations of the NUHS annual report review team.

The motion was unanimously approved.

Dr. Swenson rejoined the meeting.

Canadian College of Naturopathic Medicine

No board members had a conflict of interest.

Dr. Olehausen, chair of the review team, stated that since CCNM and BINM merged early this year, the team reviewed both of their annual reports. The team found the reports to be complete and responsive, and that the coronavirus report portion showed compliance with CNME's temporary policies.

The team reiterated the observation made by Ms. Woodin, CPA, MBA, that the financial issues associated with both CCNM (insufficient reserves) and the former BINM (operating at a deficit) have been temporarily addressed due to the merger, but that the merged institution will need to take effective measures to reverse the situation and establish solid financial stability. For this reason, the finance-related findings can be removed; however, the CNME will need to keep close tabs on the merged CCNM to make sure that the institution doesn't go backwards and find itself challenged financially.

Additionally, both institutions have an outstanding finding regarding over-reliance on part-time faculty (in the base of BINM, there is an outstanding recommendation; in the case of CCNM, an outstanding area of interest). These findings should be consolidated into a single recommendation.

Dr. Seitz noted that as a condition of approving the substantive change request to continue accreditation of the ND programs offered by the merged institution, CCNM is required to submit a focused report by October 1, 2021, and to undergo a focused site visit in 2022.

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

To consolidate previous BINM and CCNM findings into finding that pertain to the merged CCNM as follows:

Recommendation III-1: The team is concerned that while the 2021 merger of CCNM and BINM resulted in increased financial stability in the near term due to the cash reserves of the former BINM combined with asset represented by CCNM's Toronto campus, there are nonetheless potential financial risks to merged CCNM due to the lease expense associated with the New Westminster campus combined with CCNM's recent financial track record of developing only minimal financial reserves. The merged CCNM must, if it is to develop financial stability in the long-term, rapidly achieve a consistent, positive, annual financial performance across both campuses. (Std. III B.1 & Std. III.C.1)

Recommendation IV-1: The team is concerned that the overall small number of core/full-time faculty at both the New Westminster and Toronto campuses of CCNM impedes the program's ability to effectively address the institution's service needs, such as integration of the clinical and didactic portions of the curriculum, activities related to shared governance, participation in research and committee work, and so on. The program must increase the number of core/full-time faculty, including the appointment of core/full-time clinic faculty. (Std. IV.B.1 & Std. IV.B.2)

To request that the focused report due in October 1, 2021 also include information on the following in addition to the information already requested:

- **An update on any plans regarding the New Westminster campus in order to address the issue of the rental expense in relation to the revenue generated;**
- **An update on the question of over-reliance on part-time faculty; and**
- **An update on plans to improve long-term financial stability.**

The motion was unanimously approved.

Universidad Ana G. Méndez

No board members had a conflict of interest.

Dr. Joni Olehausen, chair of the review team, stated that the team found the report to be complete and responsive, and that the coronavirus report complied with CNME's temporary policies. Dr. Olehausen also stated that the team recommends to the board that none of the current recommendations or areas of interest be removed (namely, the ones from the 2020 CNME evaluation visit for initial accreditation).

There was discussion on the recent administrative turnover, adequacy of faculty, and the program's prospects for engaging in research given Dr. Valentín's departure (he was the administrator leading the development of naturopathic research). The board felt that a focused report, due prior to the fall 2021 board meeting, would be in order regarding (i) plans for strengthening research activities, the adequacy of faculty in terms of numbers, training and credentials for purposes of teaching, service and research.

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

To accept the recommendations of the UAGM annual report review team regarding continued reporting on outstanding recommendations and areas of interest; and to require a focused report due by October 1, 2021 regarding: (i) plans for strengthening research activities, and (ii) the adequacy of faculty in terms of numbers, training and credentials for purposes of teaching, service and research.

The motion was unanimously approved.

The board asked Dr. Seitz to also communicate to UAGM the value and importance of becoming involved with AANMC and CCACO.

Southwest College of Naturopathic Medicine

Dr. Alexander recused herself from the meeting for this agenda item due to a conflict of interest.

Dr. Prenguber, chair of the review team, stated that the team found the report to be complete and responsive, and that the coronavirus report complied with CNME's temporary policies. Dr. Prenguber also stated that there were two outstanding areas of interest, and that the team recommends to the board that one Areas of Interest VI-1 be removed based on documentation submitted, and that the

other one—Area of Interest II-1—be retained, as insufficient documentation was provided to remove it.

Dr. Prenguber, moved, and Dr. Swenson, seconded, the following motion:

To accept the recommendations of the SCNM annual report review team.

The motion was unanimously approved.

Bastyr University, Naturopathic Medicine Program

The following board members recused themselves from the meeting for this agenda item due to a conflict of interest: Drs. Olehausen, Wallace, Jenab and Hope (note that Drs. Wallace and Hope left the meeting, while Drs. Olehausen and Jenab were present, but did not participate or vote).

Dr. Swenson, chair of the review team, stated that the team found the report to be complete and responsive, and that the coronavirus report complied with CNME's temporary policies. Dr. Swenson also stated that the team recommends to the board three of the outstanding recommendations (II-1, II-2 and II-3 be removed based on the documentation provided, and that the remaining recommendations (IV-1 and IV-2) be continued (there was, however, evidence of progress). The team also recommended that the following areas of interest be removed: III-1, IV-3, V-1, VI-1, VI-2; and that the following two areas of interest be continued: IV-1 and IV-2. Finally, the team recommends that the one area of interest pertaining to the residency program be removed.

Dr. Stretch, moved, and Mr. Andrew, JD, MA, seconded, the following motion:

To accept the recommendations of the Bastyr U. annual report review team.

The motion was unanimously approved.

Miscellaneous Business

New CNME Website Portals; Electronic Security

The board asked Dr. Seitz to look into ways to ensure greater online security in regard to the CNME website (including the board member portal), email communications, electronic recordkeeping including materials maintained on individual CNME computers, and so on.

The board discussed with Dr. Seitz the possibility of adding to the CNME website a way by which schools can directly upload required documents for review by the board or accreditation site teams. Dr. Seitz will look into this as part of the project to develop portals for both board members and site visitors.

Dr. Wallace thanked the board for a very productive meeting and then asked for a motion to adjourn.

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

To adjourn the meeting.

The motion was unanimously approved.