Handbook for
Onsite Evaluators of
Naturopathic Medicine Programs

2019 Edition

COUNCIL ON NATUROPATHIC MEDICAL EDUCATION

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Preface

The accreditation process for an ND program, like professional programs in other established medical/healthcare fields, is a multistep review process. A key aspect of the process is a comprehensive onsite review by a team of peer experts, which the CNME refers to as an "evaluation visit." The primary purpose of this visit is to assess a program's compliance with CNME's accreditation standards and policies based on the team's review of the program's self-study report and other required materials, and on interviews and observations conducted in the course of the visit. If an accredited program is also a CNME-recognized sponsor for residency training, the team activities include evaluating the program's compliance with CNME's post-doctoral residency training requirements.

The full accreditation process is described in detail in CNME *Handbook of Accreditation*, which also contains the Council's accreditation standards, policies and procedures. (A similar, but shorter publication—the CNME *Residency Handbook*—contains the Council's requirements and policies regarding post-doctoral residency training.) This *Handbook for Onsite Evaluators* provides evaluators an overview of the onsite evaluation process and guidance on how to conduct an evaluation visit. Additionally, the Council has a set of *Worksheets for Onsite Evaluators* that contain checklists for each of the Council's eleven accreditation standards; evaluators use these checklists during an evaluation visit to make sure that they gather all of the information needed to assess compliance with the Council's standards. Finally, the Council provides visitors with an *Evaluation Team Report Template* that provides guidance on the content and format of team reports. It is important for an evaluator to be familiar with these four publications and to have them available for reference during an evaluation visit.

In addition to sending teams to conduct comprehensive evaluation visits as part of the initial accreditation and reaccreditation process, the Council occasionally sends teams to conduct "focused visits" to an accredited ND program. These visits are conducted when the Council has major concerns regarding a program's compliance with one of more accreditation standards, and determines that an onsite review process is necessary in order to adequately assess the potential non-compliance issues.

Procedures

This section provides summary information on the responsibilities of an evaluation team in preparing and conducting an onsite visit, and on the support the Council's executive director provides in organizing and conducting the visits.

The Executive Director's Role in Preparing for the Visit

The Council's executive director has the primary responsibility for advance preparation for an evaluation visit. In organizing and arranging for an evaluation visit, the executive director:

1) Determines the dates for the visit in consultation with the institution's/ND program's leadership.

2) In consultation with the Council's president, identifies potential evaluators to conduct the evaluation who do not have a conflict of interest in regard to the program, and contacts the potential evaluators to see whether they are available. (Generally, the evaluation team is appointed 4 – 6 months in advance of the visit.)

3) Appoints a team chair from among the members of the evaluation team.

4) Ensures that the program arranges appropriate accommodations for the evaluators and makes travel arrangements as may be needed (generally evaluators make their own airline flight arrangements).

5) Reviews the program's self-study report 3 – 4 months in advance of the visit to ensure that it is complete and responsive, and informs the program of any deficiencies that need to be addressed before the report is provided to the evaluators. (Note that the program is required to send the self-study report to the team at least two months prior to the visit.)

6) Contacts the ND program approximately two months before the visit to:

    a. Confirm the evaluation dates, lodging reservations, and any travel arrangements for which the program is responsible;

    b. Provide evaluator contact information including names, titles, addresses, telephone numbers and email addresses;

    c. Request a private on-campus meeting room for the evaluation team, and any computer hardware and software or other support equipment or services that evaluators will need while on campus;

    d. Request that any documents for the evaluators' review onsite be placed in the meeting room (the Council specifies that certain materials be made available);

    e. Request that the program draft a detailed schedule for the evaluation team visit in consultation with the team chair and executive director; and

    f. Arrange for a deposit from the school of the anticipated evaluation expense.

7) Provides to the evaluators 1 – 2 months before the visit the following:

    a. A confirmation of the evaluation dates and lodging reservations, and information on transportation and other local arrangements for the visit;

    b. The materials needed to conduct the visit, including: the *Handbook of Accreditation*, *Residency Handbook* (if a residency program will be reviewed), *Handbook for Onsite Evaluators*, *Evaluator Worksheets*, *Evaluation Team Report Template*, *an expense voucher*, and any background materials that might be relevant for the visit (e.g., previous Council reports and decisions).

Evaluator Preparation for the Onsite Visit

In addition to the materials the evaluators receive from the executive director listed above, they also receive from the program—generally two months before the visit—the program's comprehensive self-study report, the program's catalog or academic calendar, a class schedule, and other pertinent documents.

To adequately prepare for a visit, team members must review a large volume of materials before arriving on campus; for this this reason, it is exceedingly important to begin preparing for the visit several weeks beforehand by:

- Reviewing all of the materials provided by the executive director noted above related to conducting an evaluation visit (e.g., *Handbook of Accreditation*)
- Reading through and analyzing the program's self-study report and supporting documents;
- Reading through and analyzing other background materials on the program provided by the Council's executive director; and
- Preliminarily formulating questions and issues to address during the visit based on a review of the self-study report and other materials.

The evaluation team chair, in consultation with the executive director, assigns team members their individual responsibilities for the evaluation visit, including which accreditation standards each team member is primarily responsible for covering. After team members have had a chance to read and analyze materials, the executive director or team chair contacts team members to find out whether any additional materials are needed from the program prior to the visit. The team chair may also, at his or her discretion, convene a phone meeting of the team prior to the evaluation visit to review the visit schedule and individual members' responsibilities, discuss any issues that the chair considers significant, and ask for feedback from team members on any issues they have identified. The executive director contacts the program if the team has any requests for additional materials and/or information prior to the visit.

Conducting the Evaluation Visit

Evaluation visits are usually scheduled for three days, with the final day concluding by mid-afternoon to accommodate travel arrangements. The evaluators normally arrive the day before the visit begins in time to participate in a private planning meeting (the "pre-visit team meeting") held in the evening. The meeting covers the following:

1) A review of the goals and procedures of an evaluation visit, and how evaluators should conduct themselves during the visit;

2) Evaluator responsibilities, including gathering information and drafting report sections, and a review of each individual evaluator's assignments;

3) A review of the evaluation visit schedule and whether any changes to it might be necessary or desirable to ensure an adequate review;

4) A discussion in detail of the preliminary views, questions and tentative findings of team members based on their review of the self-study report and other materials; and

5) A discussion of any issues or questions that team members consider relevant for the visit.

The formal evaluation visit begins with an introductory meeting on campus with program representatives during which the following takes place:

1) The program's chief administrative officer welcomes the evaluation team, introduces the institution's representatives, and makes any announcements;

2) The evaluation team chair introduces the team members, briefly reviews the procedures the team will follow during the visit, reviews the evaluation visit schedule including any changes made by the team at its planning meeting, and informs the program representatives of any additional needs the team may have; and

3) The team is given a tour of the campus.

Following the introductory meeting, evaluation team members begin addressing their assigned responsibilities. Generally, two evaluators are assigned to cover each accreditation standard to ensure a more comprehensive review process, one of whom (the "primary" reviewer) is responsible for drafting the team report section pertaining to the standard. While onsite, evaluators engage in a number of activities, including:

- interviewing individuals and groups on campus and in training clinics, such as students, faculty, administrators, board members, student interns, and alumni;
- reviewing materials such as the minutes of board and faculty meetings, admission and student files, syllabi, and assessment documents; and
- observing clinical instruction and patient interactions to be able to assess the quality of the delivery of the education.

While the evaluation visit schedule is intended to make efficient use of the limited time available to the team, evaluators often need to make minor, ongoing adjustments to the schedule to ensure that they gather all of the information necessary to draft an accurate and comprehensive evaluation team report and formulate their findings. Also, regardless of how carefully the schedule of meetings and observations is organized to accomplish the purpose of the evaluation, last-minute changes inevitably occur while the team is on campus. Evaluators must therefore be willing to accommodate to some degree the work schedules of program personnel, while program personnel must be as flexible and available as possible for the duration of the visit.

At the completion of the each day's scheduled activities on campus, the evaluation team meets to review the day's activities, discuss any issues or findings that may have emerged, and to plan for the following day. On the evening before the last day of the visit, the team holds a more extensive meeting to begin formulating specific findings and to draft sections of the evaluation report. These meetings serve as an opportunity for:

1) Team members to report on their areas of responsibility, with a focus on the strengths and deficiencies of the program in relation to whether it is meeting its mission and objectives and is in compliance with the Council's accreditation standards and policies.

2) Team members to decide on the "commendations," "recommendations," "areas of interest" and "suggestions" and for each area evaluated. Commendations reflect noteworthy areas of strength identified by the evaluation team. A recommendation is a formal finding that refers to specific area where a program has a problem in meeting—or is out of compliance with—a standard or policy. For recommendations, the team should cite the specific reference from the *Handbook of Accreditation* upon which the recommendation is based. Additionally, the narrative of the team's evaluation report must include evidence to support each recommendation. An area of interest denotes a problematic situation that could potentially evolve to non-compliance with a CNME standard or policy; while not a formal finding like a recommendation, an area of interest must be referenced to a specific standard or policy in the team report. Finally, suggestions reflect expert advice that evaluation team members may wish to offer the program; the program is not obligated, however, to follow the advice.

3) A review of program representatives who have been—or will be—interviewed to make sure that no institutional personnel have been left out who the team considers necessary to interview.

4) Developing a consensus on the team recommendation to the Council regarding the program's continued candidacy or accreditation (Appendix C is designed to assist the team in formulating its recommendation). Normally, the team will formulate its recommendation the evening before the final day of the visit or on the final day. However, if a team feels it needs more time to reflect on its recommendation, the team chair may convene a phone meeting following a visit to determine the recommendation.

5) Reviewing the *Evaluation Team Report Template* and "Characteristics of a Well-Written Evaluation Report" (Appendix B), and for the chair to express his or her expectations for submission of team members' draft sections of the evaluation team report.

6) Reviewing the format of the exit meeting.

Just before leaving campus on the final day of the visit, the team holds a brief "exit meeting" with the program. The program's chief administrative officer may invite anyone from the institution to attend the meeting.

At the exit meeting, the team chair presents an oral report that (i) outlines the strengths and deficiencies of the program observed by the evaluation team during the visit, and (ii) summarizes the commendations and recommendations identified by the team—noting that the Council will make the final decision regarding findings following an accreditation hearing. The chair's report includes references to the pertinent standards and policies in the *Handbook of Accreditation* upon which the findings are based. The chair's oral report should include enough detail to provide a clear idea of the content of the written evaluation team report to follow. The team chair does *not*, however, inform the program representatives of the team's confidential recommendation to the Council.

Following his or her oral report, the team chair invites the program representatives to ask any clarifying questions they might have about the report, and may at his or her discretion allow for some brief discussion of the report. However, the exit meeting is not a forum for the program to raise disagreements it may have with the team's findings or to engage in lengthy discussion or debate. The chair informs the program's representatives that the chief administrative officer will be given an opportunity (i) to respond informally in writing to the draft team report to correct factual errors, and also (ii) to respond formally in writing to the final report (the latter response is referred to as a "Formal Institutional Response"). The team chair closes the meeting with a brief description of the remaining steps in the accreditation process and an appropriate statement of thanks.

The Process Following the Evaluation Visit

After the evaluation visit, the following steps are taken to complete the work of the team:

1) Within one week following the onsite visit, evaluators send the team report sections for which they are responsible to the team chair and executive director for review. If any sections of the report lack sufficient detail or are unclear, the executive director or team chair may request a team member to rework the section, or the executive director or team chair may revise the section.

2) Within two weeks following receipt of the report sections, the executive director assembles the report into a single, complete draft, and edits and formats the draft report with regard to formatting and style. If the executive director believes that any report content requires revision, he or she confers with the team chair, who has final say on the report content.

3) Within one month following the visit, the executive director distributes the draft report to the members of the evaluation team and the program's chief administrative officer. The evaluation report does *not* contain the team's confidential recommendation to the Council on candidacy or accreditation.

4) The program is given an opportunity to offer in writing any suggested factual corrections to the draft report within a timeframe specified by the Council's executive director, usually within two weeks of when the draft is sent. A team member may also offer comments or suggestions on the report. All input on the report is sent to the

executive director who, in turn, forwards it to the team chair; the team chair has responsibility for approving the content of the final report.

5) Once the evaluation team report is finalized, the executive director mails three copies to the program's chief administrative officer; prior to the Council's hearing on the program's accreditation/reaccreditation, the program is given an opportunity to submit a formal institutional response ("FIR") to the report should the program wish to contest any of the team's findings.

6) In preparation for the Council's accreditation/reaccreditation hearing, the executive director provides to the Council the following materials: the evaluation team report, the programs FIR (if one is submitted), and the team's confidential recommendation regarding the accreditation decision. Additionally, Council members have access to the program's self-study report, should they wish to review any parts of it.

7) The program's chief administrative officer—and any other program representatives that he or she may select—attends a closed session of the Council the purpose of which is to conduct a hearing and take action in regard to the program's candidacy or accreditation status (the range of possible actions is described in the *Handbook of Accreditation* and is outlined in Appendix C). The evaluation team chair and other team members may also be in attendance. At the start of the closed session, the team chair, one of the other evaluators on the team, or a member of the Council summarizes the content of the evaluation team report. The chief administrative officer is then invited to comment on the onsite visit process and to respond orally to the evaluation team report (the Council will also have received prior to the hearing the program's FIR). Following the chief administrative officer's remarks, Council members may ask questions of the program representatives. Following the question-and-answer period, the program's representatives leave the meeting room, and the Council remains in closed session to discuss any issues it may have and to take action on the program's candidacy or accreditation.

8) Within ten days following the meeting, the Council's executive director sends a letter to the program's chief administrative officer, with a copy to the institution's chief executive officer, reporting the Council's action.

9) The Council limits access to the team's evaluation report to the executive director, members of the Council, members of the evaluation team, the program's chief administrative officer, the chief administrative officer's supervisor (e.g., provost) and the institution's chief executive officer. The Council may also share the evaluation report with the U.S. Department of Education, with a recognized institutional accrediting agency that has granted or is considering status for the institution at which the program is located, or with a state or provincial postsecondary agency that has recognized the school. The Council's action on a program's candidacy or accreditation is public information, and is published on the Council's website and in the *Handbook of Accreditation*.

Evaluation Team Principles in Conducting an Onsite Evaluation

1. The evaluation team works as a unit. The evaluators have individual assignments, but each evaluator is responsible to the team as a whole.

2. The team makes an independent analysis—for use by the Council and the program—of the performance and effectiveness of the program in achieving its mission and objectives and in meeting the Council's accreditation standards and policies.

3. Each evaluator is responsible for carefully reviewing the self-study report and other materials that have been provided, and for becoming familiar with the Council's accreditation standards and policies.

4. Accreditation is a peer review process, and while on campus team members should conduct themselves as colleagues and not as inspectors. This does not preclude, however, requesting to see specific materials and to speak with certain individuals in order to verify information in a program's self-study report.

5. The team's primary focus throughout the process is on determining: (i) whether the program is achieving its mission and objectives; (ii) whether the program is in compliance with the Council's accreditation standards and policies; and (iii) whether the program's performance with respect to student achievement is satisfactory.

6. Each member of the evaluation team respects the confidentiality all materials received; the team's recommendation; the evaluation team report; and information obtained while on campus.

7. An evaluator's role as a peer reviewer includes identifying a program's strengths and offering possible solutions for significant problems.

8. Evaluators make a point of listening well with the intent of seeking information and understanding, and refrain from becoming involved in any interpersonal conflicts that may exist within the institution and/or program.

9. Each team member seeks to accommodate the program's representatives in setting a schedule for meetings and interviews.

10. While evaluators may gain valuable insights or have access to useful resources relevant to their own professional roles, they conduct themselves with sensitivity and discretion—recognizing the requirements of confidentiality and the primary purposes of the evaluation process. In particular, an evaluator should not take any materials for personal or professional use.

11. The team chair ensures that the evaluation visit schedule includes sufficient opportunities to meet with administrators, academic and clinical faculty members, students, and governing board members to gather information needed for formulating findings and drafting the evaluation team report.

12. Team members confer frequently and attend all meetings scheduled by the chair.

13. Team members submit to the team chair and executive director, by the date set by the chair,

the drafts of the evaluation report sections for their assigned areas.

Characteristics of a Well-Written Evaluation Team Report

1. The report analyzes, interprets, gives perspective to, provides an objective viewpoint of, and weighs the quality of the program's effectiveness. It also describes briefly what the program is and does, and avoids including trivial and unverified information.

2. The report is fair and accurate, citing both weaknesses and strengths. Whenever a finding of non-compliance ("recommendation") is cited in the report, the evidence for the finding is presented in sufficient detail to allow the reader to make an informed judgment as to the validity of the finding.

3. The report content should be objective and impersonal, avoiding references to individuals by name (though position titles may be referred to). First-person statements should not used, since the report represents the views of the team as a whole.

4. Comprehensive evaluation team reports include a detailed analysis of a program's success with respect to student achievement in relation to the program's mission and educational objectives (this analysis appears under the Standard on Mission and Objectives).

5. The team report for a comprehensive evaluation visit is structured in accordance with the *Evaluation Team Report Template*.

6. Statements about actual or potential deficiencies in meeting the Council's standards are distinct from statements that offer advice for a program's consideration. An evaluator may include advice or suggestions in the report's narrative, but a program has no obligation to follow the advice or suggestions.

7. The report may include one or more "recommendations," "areas of interest" and "commendations" at the end of the various sections of the evaluation report. A recommendation means that action by the program is required in order for it to obtain or remain in compliance with a standard or policy. An area of interest means that there is some deficiency that does not require a formal finding (i.e., recommendation), but does merit careful attention and ongoing reporting by the program. The report contains the evidence on which recommendations and areas of interest are based, and cites the applicable accreditation standard and section. Commendations are offered for exceptional achievements or performance by the program; however, individuals should not be commended by name or position.

8. While it is necessary to discuss each significant aspect of the program in enough detail for the report to be useful, the information is succinctly written for readability and comprehension. Team members should, whenever possible, write their report sections using active rather than passive constructions in order to enhance readability, and should strive for clarity and directness of expression.

The Evaluation Team's Confidential Recommendation

Program: ____

Evaluation Dates: ____

Type of Evaluation:

- ☐ Comprehensive visit for Initial Candidacy
- ☐ Comprehensive visit for Reaffirmation of Candidacy
- ☐ Comprehensive visit for Initial Accreditation
- ☐ Comprehensive visit for Reaffirmation of Accreditation
- ☐ Focused/Interim visit.

The evaluation team's recommendation to the Council is:

- ☐ Grant initial candidacy.
- ☐ Deny initial candidacy.
- ☐ Reaffirm candidacy.
- ☐ Grant initial accreditation.
- ☐ Defer a decision on initial accreditation pending: ______________________________ ____.
- ☐ Deny initial accreditation.
- ☐ Reaffirm accreditation.
- ☐ Require the program to submit a focused report due by ____________, which addresses the recommendations in the current evaluation report, both the major recommendations and the recommendations at the end of each section of the report.
- ☐ Require a focused evaluation visit following the program's submission of a focused report, to evaluate the program's progress on the recommendations in the current evaluation report.
- ☐ Accept the program's focused report (no action required to reaffirm accreditation or candidacy).
- ☐ Issue a letter of advisement to correct deficiencies by ____________.
- ☐ Impose probation until ____________.
- ☐ Issue a show-cause letter with a termination date of ____________.
- ☐ Remove: ☐ Letter of advisement. ☐ Probation. ☐ Show cause.
- ☐ Terminate: ☐ Accreditation. ☐ Candidacy.
- ☐ Other decision ____.

Chair's Signature: ________________________ Date: ____________