

CNME Strategic Plan 2017 – 2020

INTRODUCTION

Most of the core, ongoing work of the Council on Naturopathic Medical Education is determined by its status as a U.S. Department of Education-recognized accrediting agency for naturopathic medicine doctoral (ND) programs. As such, the CNME must comply with USDE's regulations, which require a range of ongoing activities, including: periodic review and revision of its accreditation standards and policies to ensure continued relevance and conformity to USDE requirements; carrying out accreditation-related processes such as conducting evaluation visits and holding hearings for the purpose of granting candidacy, initial accreditation, and reaccreditation; training evaluators; publishing information on the Council's standards, policies and decisions; counseling new ND programs regarding the accreditation process; and periodically applying for USDE re-recognition.

Another significant aspect of CNME's ongoing work is determined by its status as a U.S. non-profit organization with U.S. Internal Revenue Service 501(c)(3), tax exempt status. Among other things, the Council must make sure to operate according to U.S. federal and state laws and regulations and its own bylaws, periodically appoint new members, review its financial performance and maintain financial soundness, make sure that accurate minutes are kept, submit required filings, and in general attend the housekeeping-type tasks that protect its non-profit incorporation status and integrity as an organization, and that ensure a smooth operation.

Apart from the ongoing work outlined above—which accounts for most of Council's and staff's time and effort—the CNME has assumed the discretionary responsibility in a number of other areas. These include: regulating postgraduate naturopathic residencies; assisting U.S. and Canadian national, state and provincial professional associations and other organizations on matters related to licensure (e.g., gaining legal recognition, expanding scope); providing relevant information to ND students and graduates who are dealing with immigration and work permit issues; and generally being of service in efforts to build and strengthen the naturopathic profession in Canada and the U.S., as well as internationally.

Moving forward, there are areas for improvement, and there are changing external circumstances that present challenges and opportunities for both the Council and the wider profession. Among other things, federal, state and provincial licensure and recognition of the naturopathic profession is progressing slowly; enrollment in some ND programs has been static or is falling; the expansion of residency opportunities is slow due to funding challenges; and there is uncertainty about the directions in which U.S. federal regulation of accrediting agencies and higher education in general is headed and how possible future legal and regulatory changes might impact the CNME.

Given these considerations and the fact that CNME's most recent strategic plan covered the period 2013 – 2016, the Council began a strategic planning process at fall 2016 meeting, which it continued at its spring 2017 meeting. Additionally, the Strategic Planning Committee met between Council meetings to further the strategic planning discussion. This strategic plan for the period 2017 – 2020 represents the product of this work.

COMMUNICATIONS

Naturopathic medicine is still relatively marginalized in the U.S. and Canada: NDs are licensed/regulated in less than half the U.S. states and in 5 of 13 Canadian provinces/territories; ND services are not covered under the universal Canadian healthcare system, and there is little health insurance coverage of ND services in the U.S.; U.S. federal programs that reference MDs rarely also include NDs capable of providing similar services; and NDs are seldom integrated into conventional medical settings, and sometimes struggle to build a practice. While the CNME is not a frontline advocacy organization for the naturopathic medical profession—and, as an IRS 501(c)(3) organization, is prohibited from engaging in any substantial political action—its status as a USDE-recognized accreditor and, to a lesser extent, its regulation of naturopathic residency programs are essential to the naturopathic field's credibility, both in the U.S. and Canada (since Canada does not have a separate accrediting body for ND programs, the naturopathic profession there has relied on the CNME for many years to serve as the accreditor for Canadian ND programs, and provincial naturopathic regulatory agencies utilize CNME accreditation as a basis for ND regulation in part because USDE recognition confirms legitimacy). Indeed, without a credible accreditation process, there would be no professional licensure/regulation or inclusion in any governmental programs. And while the CNME is not a professional association or a lobbying organization, it can play an important advocacy role by providing information on ND education and accreditation to legislators, regulators and other policymakers, as well as to the general public.

Given the importance of the CNME to the credibility of the naturopathic medical field, and the subtle but key advocacy role it plays, it is important at this juncture for the Council to heighten its public presence through the following actions:

- Developing a more effective website targeted to the needs of our various stakeholders, internal and external (e.g., potential students, regulators, CNME-accredited ND programs).
- Seeking opportunities to remind the broader naturopathic professional about the important work of the CNME and its availability to support the field by providing information and an appropriate level of advocacy for specific initiatives; this will be accomplished by providing reports on the work of the CNME to Canadian and U.S. national associations and major publications. The CNME executive director will have primary responsibility for this activity, drawing upon individual board members as needed.
- The CNME executive director will continue to serve as a liaison to other organizations on behalf of the Council, and will arrange for board members to represent the CNME at key meetings when necessary.

The timeline for the above actions are as follows:

- By the fall 2017 Council meeting, the CNME's redesigned website will be available for beta-testing by the CNME board, and a final version of the website will be operational by the end of 2017 or beginning of 2018.
- Beginning in late 2017 or early 2018, the CNME will provide an annual report to the American Association of Naturopathic Physicians (AANP), Canadian Association of Naturopathic Doctors (CAND) and Naturopathic Doctor News and Review (NDNR) highlighting CNME initiatives, accomplishments and regulatory actions.

USDE REGULATION OF PROGRAMMATIC ACCREDITATION

The CNME has been recognized as a programmatic accrediting agency by the USDE since 2003, and has in recent years consistently achieved a full five-year (i.e., the maximum period) re-recognition when up for renewal. CNME will again be up for re-recognition in 2020. As noted in the introduction, however, there is uncertainty about the direction in which U.S. federal regulation of accrediting agencies is headed, which could potentially pose challenges in maintaining compliance with USDE regulations. The current (as of 2017) U.S. federal administration has indicated its interest in reducing the overall number of federal regulations by calling for repeal of two regulations for every new regulation that might be enacted; on the other hand, there are U.S. senators who are calling for increased federal oversight of recognized accreditors. Meanwhile, the regulatory framework for higher education accreditation in the U.S. is very well-established, so we may not see any major changes in this area—perhaps, at least, not in the near future.

As it has done in the past, the CNME must keep a close watch for any U.S. federal regulatory initiatives that may impact the CNME, and must be prepared to expeditiously make changes to standards, policies and procedures to meet any new requirements. The following is the means by which the CNME executive director will continue to monitor the regulatory environment:

- Continued attendance at conferences of the Association of Specialized and Professional Accreditors (ASPA);
- Continued attendance at the annual conference of the Council on Higher Education Accreditation (CHEA) and any other CHEA functions that are relevant to the CNME; and
- Periodic attendance at meetings of the National Advisory Committee on Institutional Quality and Integrity (NACIQI)—the advisory body to the USDE that conducts accrediting agency recognition hearing as well as general advice on accreditation issues—to learn first-hand the current regulatory perspectives of the USDE and NACIQI, and the specific accreditation issues they are most focused on.

CHALLENGES FACING ND EDUCATIONAL INSTITUTIONS

Institutions offering ND education face some daunting challenges, including:

- For a number of students who might otherwise be interested in pursuing an ND degree, the cost, time commitment, and challenge of building a viable livelihood deter some people from applying. Due to these and/or other factors, enrollment has been static or decreasing at some institutions.
- There are many regions within the U.S. and Canada where ND education is not available. For some academic fields, the lack of nearby institutions is solved by the availability of online program options; however, this is not feasible for a licensed medical field such as naturopathic medicine, though the CNME at least now allows for some use of online education in the context of largely residential programs.
- In the U.S. there are questions as to Congress's and the federal administration's commitment to maintaining existing federal loan programs, and students' collective education debt burden continues to increase, making borrowing money for education less feasible over time.

While the CNME cannot on its own solve these large, systemic challenges, it must remain engaged in the broader strategic conversations within field, and continue to be a resource for accredited

programs and the naturopathic profession in whatever ways are consistent with its mission. Here are a few ways in which the CNME can be a resource:

- The CNME should be willing to consider proposals from individual accredited programs, as well as from the Association of Accredited Naturopathic Medical Colleges (AANMC), for changes to standards and policies that might encourage the sharing resources and other collaborative ventures aimed at controlling costs, or that might allow for the use of innovative technology.
- The CNME executive director should continue to participate in the Canadian and U.S. Naturopathic Coordinating Councils, the North American Board of Naturopathic Examiners (NABNE) advisory committee, and other multi-stakeholder organizations to stay aware of—and engaged with—emerging issues and problems facing the naturopathic medical field.
- In some circumstances, the CNME should be a convener for conversations on important, multi-stakeholder issues.

Additionally, both to safeguard its USDE recognition status and to support the profession, the CNME must continue to monitor closely institutions that are experiencing financial challenges—whether due to changing external circumstances or other reasons—and should continue to be available to provide advice to institutions on financial management.

STUDENT/GRADUATE AND PATIENT OUTCOMES DATA

Student and graduate outcomes data plays an important role in higher education: it gives institutions information upon which to engage in ongoing improvement of programs, and it provides accreditors indicators of whether the institutions and programs they accredit are achieving their mission and providing good value to students and other stakeholders. For these reasons, USDE oversight of recognized accrediting agencies includes a strong focus on student assessment and program evaluation, taking into account a variety of assessment measures and outcomes.

Additionally, by virtue of operating healthcare clinics for the purpose of training student interns, ND programs generate patient outcomes data. The CNME does not require accredited ND programs to compile and analyze this data; however, the CNME and other organizations within the field of naturopathic medicine recognize that some of this data may be valuable for demonstrating the efficacy of naturopathic medical care for certain conditions or patient populations.

While data has its important place in higher education and medical research, it's also important to be mindful of the limitations on the collection, review, accuracy and overall usefulness of data. As one sociologist noted: “Not everything that can be counted counts, and not everything that counts can be counted.” Furthermore, in a culture such as ours that places a strong emphasis on the importance of measurability, a great deal of suspect data is generated in many fields of endeavor. Finally, in analyzing data, there are the problems of confounding factors, the appropriate time horizon for seeing results, and appropriate methodology. So the Council must be judicious in its data collection requirements.

Over the course of the next three Council meetings (spring and fall 2018, and spring 2019), the Council will review its current data generation and collection requirements for ND programs—which are found in Standard VII (“Assessment of Student Learning and Program Evaluation”) and

in the annual report form—and will also engage the school community in discussion on the potential uses of the patient outcomes data they generate. Regarding this latter discussion: The CNME recognizes that it is not part of its mission to require schools to collect and use data to foster increased public acceptance of the profession; nonetheless, convening a conversation on this topic may have useful benefits for both the schools and the profession.

EXTENDING CNME RECOGNITION TO ND PROGRAMS OUTSIDE OF THE U.S. AND CANADA

As was noted in the previous CNME strategic plan, accreditors in a number of other professional fields provide recognition options to foreign programs outside of the U.S. and Canada—whether an equivalent form of accreditation or some less stringent form. On occasion, the Council is contacted by foreign institutions interested in accreditation for their ND programs. While it is not currently part of CNME’s mission to offer recognition to these programs, doing so in the future may help to support the growth and acceptance of naturopathic medicine around the world. The CNME should remain open to the possibility of extending its recognition beyond the U.S. and Canada in the event it is contacted by a foreign institution or governmental entity that is potentially interested, with the caveat that any work in this area must not compromise the CNME’s credibility.

Apart from any formal recognition process that the CNME may consider developing for foreign programs, it should stand ready to serve as a source of information and advice on accreditation reflective of the U.S and Canadian accreditation systems. To this end, the CNME executive director and Council members will make themselves available as time and circumstances permit.

CNME PROGRAM OF STUDY STANDARD

As a programmatic accreditor, CNME Standard VI, “Program of Study,” is at the heart of the CNME’s requirements for ND programs. This standard was reviewed and revised as part of a comprehensive review of the standards that was begun in 2014 and completed at the end of 2015. Prior to the comprehensive standards review, the CNME also developed requirements and guidelines for the use of online/distance education technology in the delivery of ND programs. While there are currently no pressing issues related to program content, the CNME must remain open to reviewing and revising this standard to reflect the changing external environment. Questions that have come up in this regard are: Should ND programs be required to teach to the most expansive scope of practice currently available? Should and does the program of study standard ensure that NDs are adequately trained to practice “primary care”? How should the CNME respond to the circumstance where it appears that some ND programs are providing only cursory training in modalities that others consider core to naturopathic medicine (e.g., homeopathy), or seem to be placing an undue emphasis on a given modality in the clinical experience (e.g., traditional Chinese medicine)? CNME-accredited ND programs are intensive, demanding and content-heavy to a degree that sometimes adversely impacts student well-being: Is this an issue the CNME should try to address? Finally, ND program tuition is fairly expensive, especially since there are generally fewer and less lucrative employment opportunities for NDs in comparison to practitioners in conventional medical fields: Is there any way in which CNME can help address the cost issue? These and other questions will be addressed in the context of the next comprehensive review of the standards, or sooner as circumstances may necessitate.

CNME REGULATION OF RESIDENCY PROGRAMS

During 2016 – 2017, the CNME engaged in comprehensive review of its standards, policies and guidelines for CNME-recognized residency sponsors and CNME-approved residency sites, which resulted in a number of changes that were adopted by the Council at its spring 2017 meeting. Additionally, changes were made to the CPNME database to make it more user-friendly for the residency directors.

One of the main changes to the standards was to allow for greater flexibility in the educational/practice focus of residencies; this change reflects the fact that professional opportunities for NDs are starting to be become more widely available in conventional and integrative medical settings. The Council needs to continue to monitor the development of naturopathic residencies to make sure that this important postgraduate experience effectively serves both the interests of students and the ongoing development of the naturopathic profession, and needs to remain open to adapting the residency requirements to meet changing circumstances. In this vein, one question that has been posed is: Should the CNME articulate a core set of expected competencies for residency training? After the recently revised residency requirements have been in effect for three cycles—i.e., 2017 – 2018, 2018 – 2019, and 2019 – 2020—the CPNME (including residency directors) should review whether further changes/refinements are needed.

Another question that came up in 2017 is: Could the CNME residency approval process somehow be expanded to cover specialized naturopathic residencies required by naturopathic specialty organizations (e.g., Onc ANP). The CPNME will consider this question over the course of 2018.