

## Step 1 - Contact Information

**Name:**

Council on Naturopathic Medical Education

**Address:**

P.O. Box 178

Great Barrington, MA

01230

### Accrediting Agency Administrator

**Title:**

Executive Director

**Name:**

Daniel D Seitz

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413-528-8877

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### Point of Contact (POC) for the Content of the Submission

**Name:**

Daniel D Seitz

**Phone Number:**

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## Step 2

**Type of Submission:**

Petition for Continued Recognition

**This is your agency's Current scope of recognition granted by the Secretary of Education:**

The accreditation and preaccreditation throughout the United States of graduate-level, four-year naturopathic medical education programs leading to the Doctor of Naturopathic Medicine (NMD) or Doctor of Naturopathy (ND).

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**Criteria:****602.10 Link to Federal programs****Response:**

INTRODUCTION. CNME is accepted as the programmatic accrediting agency for naturopathic medical education by the naturopathic colleges and programs in the U.S. and Canada that offer four-year residential doctoral-level training, by the U.S. and Canadian national naturopathic professional associations, by U.S. state and Canadian provincial licensing boards, and by the North American Board of Naturopathic Examiners. CNME serves as a national accrediting agency for programs leading to the Doctor of Naturopathy (N.D.) or Doctor of Naturopathic Medicine (N.M.D.) degree.

The Secretary of Education has previously recognized on several occasions that CNME's accreditation or preaccreditation of programs is a required element in enabling students, graduates and faculty of such programs to participate in non-HEA programs. Specifically, the Secretary recognized that CNME's programmatic accreditation was a required element in enabling students, graduates and faculty of programs CNME accredits to participate in: (1) The "Academic Research Enhancement Award" (AREA) administered by the National Center for Complementary and Alternative Medicine—subsequently renamed National Center for Complementary and Integrative Health (NCCIH)—a component of the National Institutes of Health (NIH); and (2) The "Extramural Loan Repayment Program" administered by the NIH. Since 2015, when the CNME was last re-recognized by the Secretary, there have been two changes in regard to the CNME links, and

one link remains unchanged, as follows: (1) The AREA program, which previously pertained to both undergraduate and graduate level research, was revised in 2019 to focus only on undergraduate research; at the same time, the graduate research component of the AREA program was replaced by the Research Enhancement Award Program (REAP). CNME's accreditation continues to be a required element in establishing eligibility to participate in the REAP grant program. (2) The "Interdisciplinary Complementary and Integrative Health Clinical Research Training Award" program (T90/R90), as explained below, also meets the requirements to be consider a federal link for the CNME; this program was not previously presented as a federal link. (3) The "Extramural Loan Repayment Program" administered by the NIH remains unchanged and thus continues to be a CNME federal link.

**RESEARCH ENHANCEMENT AWARD PROGRAM (REAP).** The REAP grant program is authorized under sections 301 and 405 of the Public Health Service Act, which give the National Center for Complementary and Integrative Health (NCCIH) broad authority to develop and fund research grants. See 42 U.S.C. §§ 241 & 284; and 42 C.F.R. § 52. Acting under this authority, NCCIH developed the REAP grant program to support small-scale health-related research projects proposed by faculty members of eligible institutions, particularly institutions that have not been major recipients of NIH support. Successful applicants may receive up to \$150,000 plus associated indirect costs for research projects that may last a maximum of three years. See Research Enhancement Award Program (REAP) for Health Professional Schools and Graduate Schools (R15 Clinical Trial Not Allowed), PAR-19-134 (12/21/18, available at <https://grants.nih.gov/grants/guide/pa-files/PAR-19-134.html>). [See Exhibit A1 – REAP Funding Opportunity Purpose; the ND degree is referenced on page 6.] To be eligible for a REAP grant, an institution "must be an accredited public or non-profit private school that grants baccalaureate or advanced decrees in health professions." See PAR-19-134. NCCIH includes the "ND" degree in the definition of a "health profession degree." See *id.* Accreditation must be provided by a body approved for such purpose by the Secretary of Education. Thus, CNME accreditation is a required element in establishing eligibility for participation in the REAP grant program.

**EXTRAMURAL LOAN REPAYMENT PROGRAM (LRP).** As noted above, there has been no change to the LRP program that would have changed its status as a CNME federal link. The LRP is authorized under the Public Health Service Act—see 42 U.S.C. § 288-2—and is designed to attract health professionals to clinical research by providing up to \$50,000 in educational loan repayment, plus tax credits, to qualified health professionals. To be eligible for loan repayment benefits an individual must have a M.D., Ph.D., Psy.D., Pharm.D., D.O., D.D.S., D.M.D., D.P.M., D.C., N.D., or equivalent doctoral degree from an accredited institution. See 42 C.F.R § 68.3 and "Eligibility & Programs", see: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-116.html> [Exhibit A2 – Extramural Loan Repayment Program for Clinical Researchers, see page 2 where the "N.D." degree is referenced]. Additionally, a qualified applicant must have educational loan debt from an undergraduate, graduate, or health professions school that is accredited by a body or bodies recognized for accreditation purposes by the U.S. Secretary of Education. See 42 C.F.R. §§ 68.2 & 68.3(d). Thus, CNME accreditation continues to be a required element in establishing eligibility for participation in the LRP grant program.

**INTERDISCIPLINARY COMPLEMENTARY AND INTEGRATIVE HEALTH CLINICAL RESEARCH TRAINING AWARD (T90/R90).** The T90/R90 program is authorized under 42 U.S.C. § 288 and 42 C.F.R. 66. The T90/R90 grant is aimed at improving the capacity of the integrative health field to carry out rigorous research through mentored research training and hands-on experiences in clinical research. See Interdisciplinary Complementary and Integrative Health Clinical Research Training Award (T90/R90), PAR-13-065 (12/20/2012, available at <https://grants.nih.gov/grants/guide/pa-files/par-13-065.html>). [See Exhibit A3 – Interdisciplinary Complementary and Integrative Health Clinical Research Training Award; the ND degree is referenced on page 3.] Institutions that run a research-training program through the T90/R90 grant can only support trainees that have received a doctoral degree, such as a D.M.D., D.C., D.O., D.V.M., Sc.D., N.D., or Psy.D from an accredited institution. See Interdisciplinary Complementary and Integrative Health Clinical Research Training Award, PAR-13-065 (December 20, 2012). Thus, CNME accreditation is a required element in establishing eligibility for participation in the research training award.

**LINK UTILIZATION.** CNME-accredited ND programs continue to utilize the federal links: see Exhibit A4 – Letter from Bastyr U Documenting Federal Link Utilization, and Exhibit A5 – Letter from NUNM Documenting Federal Link Utilization. The following should be noted: (1) Since the REAP grant program is new as of 2019, no CNME-accredited programs have yet applied for REAP funding; however, Bastyr University ND faculty applied for funding under the AREA grant program in 2017, and Bastyr intends to apply for REAP funding, as noted in their letter; (2) ND graduates of both Bastyr University and National University of Natural Medicine (NUNM) are participating in the Extramural Loan Repayment Program. (3) ND graduates at NUNM are participating in the Interdisciplinary Complementary and Integrative Health Clinical Research Training Award.

### **Linked Exhibit Files**

| <b>Exhibit Title</b>   | <b>File Name</b>  |
|--|---|
| Exhibit A1 REAP Funding Opportunity Purpose  | Exhibit A1 REAP Funding Opportunity Purpose.docx  |
| Exhibit A2 Extramural Loan Repayment Program for Clinical Researchers                              | Exhibit A2 Extramural Loan Repayment Program for Clinical Researchers.docx                              |
| Exhibit A3 Interdisciplinary Complementary and Integrative Health Clinical Research Training Award | Exhibit A3 Interdisciplinary Complementary and Integrative Health Clinical Research Training Award.docx |
| Exhibit A4 Letter from Bastyr U Documenting Federal Link Utilization                               | Exhibit A4 Letter from Bastyr U Documenting Federal Link Utilization.pdf                                |
| Exhibit A5 Letter from NUNM Documenting Federal Link Utilization                                   | Exhibit A5 Letter from NUNM Documenting Federal Link Utilization.pdf                                    |

**Criteria:**

**602.11 Geographic scope of accrediting activities.**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.12(a) Accrediting Experience Initial**

**Response:**

N/A

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.12(b) Expansion of Scope**

**Response:**

N/A

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.13 Acceptance of the agency by others.**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.14(a) Category of Agency**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

## **602.14(b) Separate and Independent**

### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

### **Linked Exhibit Files**

There are no linked exhibit files.

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### **Criteria:**

## **602.14(c) Joint Use of Personnel**

### **Response:**

There have been no changes to our agency's organizational structure, standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

### **Linked Exhibit Files**

There are no linked exhibit files.

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### **Criteria:**

## **602.14(d)(e) Separate & Independent Waiver**

### **Response:**

There have been no changes to our agency's organizational structure, standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

### **Linked Exhibit Files**

There are no linked exhibit files.

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### **Criteria:**

## **602.15(a)(1) Staffing/Financial Resources**

### **Response:**

ADEQUATE ADMINISTRATIVE STAFF. There has been no change either in CNME's administrative structure or staffing since the previous ED/NACIQI review for continued recognition. The CNME continues to be managed by an executive director, Daniel Seitz, MAT, JD, EdD, who reports to the Board of Directors—CNME's governing and decision-making body—and is currently employed as a full-time employee under a three-year contract [see Exhibit B1 – CNME Executive Director Job Description]. He has served as CNME's executive director since 2004. Dr. Seitz is well-qualified for his position, both in terms of education and professional experience. Including his tenure at CNME, Dr. Seitz has 28 years of senior administrative/leadership experience in higher education, accreditation and non-profit management, primarily related to what is variously referred to as integrative, complementary and alternative medicine; additionally, he has experience in state government administration and regulatory law. Among other things, he previously served as: (i) president of the New England School of Acupuncture; (ii) chair of the Accreditation Commission for Acupuncture and Oriental Medicine (an ED-recognized accrediting body); (iii) founding dean of the graduate programs in acupuncture and Oriental medicine at New York Chiropractic College; (iv) acupuncture unit chief for the Massachusetts Board of Registration in Medicine (where he set up the licensing board for acupuncture and drafted the agency's regulations); and (v) as an advisor to acupuncture colleges and other organizations on accreditation, educational, administrative and governance issues. Dr. Seitz holds a Masters of Teaching in Mathematics from the University of Chicago, a JD degree from Boston University, and EdD in higher education administration from the University of Massachusetts, Boston [see Exhibit B2 – Daniel Seitz resume, and Exhibit B3 – Daniel Seitz employment contract].

The executive director is assisted by Jean Jenkauskas, a professional bookkeeper, who works as an independent contractor on an as-needed basis and has extensive bookkeeping experience; she has provided bookkeeping services to the CNME for 15 years [see Exhibit B4 – Jean Jenkauskas resume]. The executive director is also assisted by an administrative assistant, Michelle Manto, who provides approximately 40 hours of support per month, and is available if more time is needed; this employee handles filing, database maintenance, correspondence and mailings, preparing materials for meetings, and other routine clerical tasks. When necessary, the executive director hires outside consultants to assist with specialized needs such as computing and information systems, and to provide

expert advice on legal matters and other areas. Given the relatively small number of accredited and candidate ND programs, this level of executive and support staffing is fully adequate for handling the agency's workload. [See Exhibit B5 – CNME organization chart.]

**ADEQUATE FINANCIAL RESOURCES.** Since CNME's last ED/NACIQI review for continued recognition, CNME's financial reserves have continued to grow and now provide a very stable base for the agency, as noted below. CNME's primary revenue source continues to be the annual sustaining fee charged to accredited and candidate ND programs, which consist of a base fee component and an FTE enrollment component. The remaining revenue is derived from: intermittent application fees from new programs seeking candidacy status; fees related to CNME's oversight of postgraduate naturopathic residency programs; and interest on our reserves. Together, these revenue sources are sufficient to fully support the agency, as can be seen from our FY 2018 and FY 2019 year-end financial reports [see Exhibit B6 – CNME Finance Reports for FY 2018 & 2019; FY 2020 budget]; note that CNME's fiscal year is the same as the calendar year. During the 15 years that Dr. Seitz has served as CNME's executive director, the agency has never had to postpone any actions due to insufficient finances or staffing. It should be noted that the actual expense of conducting onsite visits to programs are charged to the programs. Thus, there is no financial impact on the CNME of conducting onsite evaluations, and an increase in the number of visits that the CNME conducts—if new programs are recognized—will not affect the CNME's overall financial situation (once in a while the CNME will underwrite the expenses of a site visitor for training purposes).

It has been the long-standing practice of the CNME Board of Directors to meet in person twice a year: once in the spring and once in the fall. At the spring meeting, the Board reviews the year-end finance report for the most recently completed fiscal year and decides whether to increase or otherwise adjust its fees for the following fiscal year based on the financial performance of the agency. At the fall meeting (which is also our official "annual meeting"), the Board reviews a draft budget for the coming fiscal year and adopts a final budget. The large majority of the CNME's expenses vary little from year to year, so drafting budgets is a relatively easy process. See Exhibit B6, which contains the budget for fiscal years 2018, 2019 and 2020.

In order to ensure financial stability, the CNME Board of Directors committed the agency a number of years ago to steadily increasing its financial reserves. As the FY 2019 year-end financial report shows [see Exhibit B6, balance sheet tab], CNME now has reserves of nearly \$289,000; this amount is greater than our annual operating expense, which is currently around \$251,000. Thus, the agency could function normally for more than a full year without any income coming in.

As noted above, the CNME reviews its current fees and considers fee increases during its spring in-person meeting. For the period 2015 – 2019, the CNME kept its fees constant, since the fee schedule was sufficient to cover expenses and generate a modest annual surplus. At its May 2019 meeting, the CNME Board decided to increase the annual sustaining base fee by 2% and the per-student FTE fee amount by \$1; this modest fee increase was implemented to cover increased expenses due to inflation and the fact that the University of Bridgeport had decided to discontinue admitting new students to its ND program and engage in a 3-year teach-out process. We anticipate increasing fees modestly over the next several years to balance the loss of fees from the University of Bridgeport once it completes the teach-out process. See Exhibit B7 – May 2019 Board meeting minutes excerpt re fees.

In order to ensure that the CNME responsibly manages its finances, we arrange for an annual review or an annual audit by a licensed CPA. [See Exhibit B8 – CNME FY 2018 Reviewed Financial Statements and Exhibit B9 – CNME FY 2016 Audited Financial Statements.] As can be seen from Exhibit B9, there were no auditor findings regarding CNME's financial management practices for FY 2016. For FY 2019, CNME plans to arrange for an audit.

#### **Staff Analysis:**

The agency has a clear organizational structure that demonstrates the agency's strong administrative capability. The agency is led by an executive director who has a strong academic background and almost 30 years of senior experience in educational leadership. The executive director is supported by a part-time bookkeeper and a full-time administrative assistant with extensive backgrounds in handling administrative data, legal issues, and other routine clerical tasks. Both of the support staff are experienced in manual and computerized systems.

In regards to financial capacity, the agency has demonstrated that it has had sufficient financial resources for at least the past 15 years, under the leadership of the executive director. Although budgets vary little from year to year, the agency has adjusted its budget every year for the past three years, demonstrating that it is receptive to the changing costs of expenses. Furthermore, the CNME has been steadily increasing their financial reserves to bolster their fiscal capabilities.

Furthermore, CNME was not significantly impacted financially when the University of Bridgeport decided to stop enrolling students to the ND program in 2019. To cover for the financial loss, CNME Board increased the annual sustaining base fee by 2% and the per-student FTE fee amount by a modest \$1. CNME plans to slowly and modestly increase the costs over the years to cover for decrease in enrollment. The fact that CNME is able to maintain its financial capabilities without burdening the programs significantly shows that it has a strong financial foundation.

However, the agency did not provide sufficient documentation to demonstrate it has adequate financial resources to carry out its accrediting responsibilities. CNME provided its 2016 audited financial statements and 2018 reviewed financial statements, but did not provide any financial statements for 2017 or 2019.

#### **Resubmission Response:**

CNME's fiscal year is the same as the calendar year, namely January 1 through December 31. CNME has for many years basically alternated having its financial statements audited or reviewed by an external accounting firm. For FY 2017, CNME arranged for a CPA-

conducted review of its financial statements--see "Exhibit D1 - CNME FY 2017 Reviewed Financial Statements". For FY 2019, CNME arranged for a CPA-conducted audit of its financial statements--see "Exhibit D2 - CNME FY 2019 Audited Financial Statements". The FY 2019 audit demonstrates that (i) CNME continues to responsibly manage its financial resources, and (ii) CNME is financially sound, with financial reserves (i.e., net assets) of \$290,738 as of the end of FY 2019--an amount greater than our annual expenses.

## Linked Exhibit Files

| Exhibit Title  | File Name   |
|--|---|
| Exhibit B1 CNME Executive Director Job Description                     | Exhibit B1 CNME Executive Director Job Description.docx                     |
| Exhibit B5 CNME Organization Chart                                     | Exhibit B5 CNME Organization Chart.docx                                     |
| Exhibit B6 CNME Finance Reports for FY 2018 FY 2019 and FY 2020 Budget | Exhibit B6 CNME Finance Reports for FY 2018 FY 2019 and FY 2020 Budget.xlsx |
| Exhibit B7 May 2019 Board meeting minutes excerpt re fees              | Exhibit B7 May 2019 Board meeting minutes excerpt re fees.docx              |
| Exhibit B8 CNME FY 2018 Reviewed Financial Statements                  | Exhibit B8 CNME FY 2018 Reviewed Financial Statements.pdf                   |
| Exhibit B9 CNME FY 2016 Audited Financial Statements                   | Exhibit B9 CNME FY 2016 Audited Financial Statements.pdf                    |
| Exhibit B2 Daniel Seitz resume   | Exhibit B2 - Daniel Seitz resume.docx                                       |
| Exhibit B3 Daniel Seitz employment contract                            | Exhibit B3 - Daniel Seitz employment contract.docx                          |
| Exhibit B4 Jean Jenkauskas resume                                      | Exhibit B4 - Jean Jenkauskas resume.docx                                    |
| Exhibit D1 - CNME FY 2017 Reviewed Financial Statements                | Exhibit D1 - CNME FY 2017 Reviewed Financial Statements.pdf                 |
| Exhibit D2 - CNME FY 2019 Audited Financial Statements                 | Exhibit D2 - CNME FY 2019 Audited Financial Statements.pdf                  |

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### Criteria:

#### 602.15(a)(2) Competency of Representatives

#### Response:

QUALIFICATIONS AND TRAINING OF ONSITE EVALUATORS. For its onsite evaluations (which we also refer to as "evaluation visits" and "site visits"), CNME selects evaluation team members from a pool of individuals—currently numbering 55—that includes college and university administrators, former and current educators/faculty members in naturopathic medical programs and related fields, practicing naturopathic physicians, and individuals with expertise in other fields that may be useful, such as finance and accounting [see Exhibit B10 – Summary of CNME Evaluator Qualifications – Jan. 2020]. As can be seen from the summary, some of these individuals also have accreditation experience with other agencies. Typically, an evaluation team is composed of four or five people, including a practicing naturopathic doctor (ND), a faculty member in a naturopathic program, and individuals with expertise in academic administration and other relevant areas, such as financial management [see Exhibit B11 – Handbook of Accreditation, p. 15, the section titled "Function and Composition of the Evaluation Team," which outlines the process for appointing evaluation teams].

The members of the evaluator pool are required to participate in an evaluator training program sponsored by the CNME, which is designed to inform them of CNME's accreditation standards and policies and how to apply them. CNME has, over the years, periodically conducted half-day and all-day evaluator training workshops on an as-needed basis—generally once every three to five years. The two most recent workshops were held in April 2016 and October 2019; both were full-day workshops [see Exhibit B12 – 2016 Evaluator Training Workshop Schedule and Exhibit B13 – 2019 Evaluator Training Workshop Schedule]. Workshops are conducted by individuals with significant higher education and accreditation experience, including individuals with expertise within the field of naturopathic medicine [see Exhibit B14 – 2019 Evaluator Training Workshop Presenter CVs]. While the CNME accredits only ND programs that are primarily residential, these programs are allowed to use a certain amount of distance/online course delivery approaches; currently, however, the use of distance/online course delivery approaches by CNME-accredited/candidate programs is very modest. CNME has adopted a set of guidelines for use of distance/online technology in the context of ND education: see the "Guidelines on the Use of Information and Communication Technology in Naturopathic Medical Education," published in the Handbook of Accreditation [Exhibit B11] on pp. 52 – 54; these guidelines are covered in the evaluator training workshop. Accreditation Standard V, Sections F and G, also set forth requirements for offering distance/online coursework in the context of an ND program [see Exhibit B11, pp. 41 – 42].

For experienced evaluators from fields other than naturopathic medicine, a CNME evaluator training workshop provides knowledge of CNME's specialized accreditation standards for naturopathic medicine programs. For the naturopathic faculty, physicians and administrators who may lack accreditation experience but are knowledgeable about naturopathic medical practice and education, a workshop provides an understanding of the accreditation process and how to apply CNME's standards and procedures.

All of the current members of the CNME Board of Directors are required to attend regularly scheduled evaluator training workshops, regardless whether they were trained previously. Current evaluators who attended previous evaluator training workshops are not required by CNME to participate in subsequent workshops, though we invite these individuals to join us if they are in attendance at a CNME meeting or otherwise available to participate. We also routinely invite well-qualified individuals to attend evaluator training workshops who have not been previously trained as CNME evaluators. These prospective evaluators are selected by CNME's president and executive director from among individuals referred by Council members, accrediting agencies, ND programs and professional associations—as well as from among individuals who self-refer. CNME also, on occasion, invites individuals through professional publications and other communications to contact CNME if they are interested in becoming an evaluator.

## Staff Analysis:

CNME has clear guidelines on the function and composition of the Evaluation Team outlined in its Handbook of Accreditation for Naturopathic Medicine Programs. The pool of potential evaluators consists of college and university administrators, current educators in naturopathic medical programs, practicing naturopathic physicians, and professionals experienced in finance and accounting. Members of the Evaluation Team are required to undergo periodic, extensive training programs, typically once every three to five years. Conducted by leading professionals in the higher education and medical field, these workshops help evaluators stay informed with new knowledge and policies, and how to apply the most up-to-date standards and procedures during site visits.

The provided documents of the CVs of the Board Members show that the CNME attracts qualified individuals to serve on the Board. The list of potential representatives is selected in a handful of ways. CNME selects potential members from a pool of leaders from U.S. and Canadian national professional societies and takes recommendations from current or former CNME Board members. The CVs and orientation agenda documents for new Board members show that members are trained and informed on protocols.

Occasionally, physicians or professionals may express his or her interest in being a Board member. The Board members interview the candidates and makes the final appointments. As demonstrated in one of the supporting documents, all new members are required to attend orientation, led by the executive director, to become familiar with the functions and responsibilities of the different roles within CNME. The agency has submitted documents regarding the qualifications of those leading training and orientation workshops, as well as the agenda of these workshops.

CNME also adopted new guidelines on the "Use of Information and Communication Technology in Naturopathic Medical Education", as stated in the handbook. Adopted in December 2015, the CNME established clear guidelines and responsibilities for distance education, including policies on distance learning, flipped classroom, hybrid learning, information and communication technology, and telemedicine, even though its programs use such educational delivery in a very limited capacity.

The agency states that Board Members are required to attend training sessions regularly. However, the agency did not provide documentation to demonstrate that Board members are trained by the agency to serve in their leadership roles.

The agency did not provide any information or documentation concerning the qualifications, selection, and training of appeals panel members.

## Resubmission Response:

BOARD MEMBER TRAINING. The CNME trains new and currently serving board members in the following ways: (i) soon after a new board member is appointed, the CNME executive director provides the new member with an orientation session--see Exhibit D3 - New Board Member Orientation Agenda; (ii) the CNME periodically provides an evaluator training workshop for current board members and invitees with appropriate professional backgrounds in order to ensure that there is always an adequate pool of qualified individuals to conduct evaluation visits; this was described and documented in the original CNME petition; and (iii) the CNME engages in occasional "in-service" workshops for members; for example, in 2017, then CNME board member John Pecchia, CPA, MBA, presented on how to review financial statements and evaluate institutional financial soundness -- see Exhibit D4 - CNME board meeting minutes - 2017-05-13, pp. 3-4, relevant section highlighted.

In order to strengthen board member training going forward, the CNME will implement the following additional steps: (i) new members will be assigned a mentor from among experienced board members for the new member's first year of service -- see Exhibit D5 - Council Membership Policy - revised draft1 (note that this revision will be reviewed by the CNME board for adoption at its annual board meeting, which is scheduled for November 7-8, 2020; the relevant section is under the heading "Additional Council Membership Requirements"); and (ii) new members will be provided with a more comprehensive packet of introductory materials for review during the new member orientation session; the introduction packet will include the following: the CNME Handbook of Accreditation (see Exhibit B1, previously submitted); CNME Residency Handbook (see Exhibit D6 - CNME Residency Handbook - 2017 edition); the CNME organization chart (see Exhibit B5, previously submitted); the CNME Expense Form (see Exhibit D7 - CNME Expense Form 2020); CNME Conflict of Interest Form (see Exhibit B24, previously submitted); a copy of the most recent annual and semi-annual board meeting agendas (see, as an example, Exhibit D8 - CNME board meeting agenda - May 2020); and the current budget of the CNME (see, as an example, Exhibit D9 - CNME FY 2020 Finance Report and FY 2021 Budget).

QUALIFICATIONS, SELECTION, AND TRAINING OF APPEALS PANEL MEMBERS. In order to address this finding, the CNME has taken--and will take--the following steps: (i) The CNME board of directors will, at its upcoming annual meeting (scheduled for November 7-8, 2020), review and consider adopting a proposed new section to its Appeals Policy requiring that the CNME appoint, train and maintain a pool of qualified individuals available to serve on a CNME appeal board (see Exhibit D10 - CNME Appeals Policy - revised draft1); (ii) in anticipation of the board's approval of the revisions to the Appeals Policy, the CNME executive director Dr. Seitz has appointed a group of qualified individuals for inclusion in the appeals board member pool, all of whom have been trained to be evaluators and most of whom have previously served on the CNME board of directors and have participated in evaluation visits (see Exhibit D11 - CNME Appeals Board Pool 2020; and Exhibit D12 - CNME Appeals Board Pool Member Bios 2020); (iii) Dr. Seitz has scheduled a training session for the members of the Appeals Board pool for November 18, 2020 (see Exhibit D13 - Email to CNME Appeal Board Pool re Training Session), and has developed an agenda and a PowerPoint presentation for the training session (see Exhibit D14 - Appeal Board Pool Training Agenda; and Exhibit D15 - Appeal Board Training Session Presentation). Dr. Seitz will be joined by current CNME board member Mr. Brian Andrew, JD, MA, in presenting the training session; in addition to being a lawyer, Mr. Andrew has experience serving on other accrediting agencies apart from CNME.

## Linked Exhibit Files

| Exhibit Title   | File Name  |
|---|--|
| Exhibit B10 Summary of CNME Evaluator Qualifications January 2020 | Exhibit B10 Summary of CNME Evaluator Qualifications January 2020.docx |
| Exhibit B11 Handbook of Accreditation Jan 2020 edition            | Exhibit B11 Handbook of Accreditation Jan 2020 edition.pdf             |
| Exhibit B12 2016 Evaluator Training Workshop Schedule             | Exhibit B12 2016 Evaluator Training Workshop Schedule.docx             |
| Exhibit B13 2019 Evaluator Training Workshop Schedule             | Exhibit B13 2019 Evaluator Training Workshop Schedule.docx             |
| Exhibit B14 2019 Evaluator Training Workshop Presenter CVs        | Exhibit B14 2019 Evaluator Training Workshop Presenter CVs.docx        |
| Exhibit D3 - New Board Member Orientation Agenda                  | Exhibit D3 - New Board Member Orientation Agenda.docx                  |
| Exhibit D4 - CNME board meeting minutes - 2017-05-13              | Exhibit D4 - CNME board meeting minutes - 2017-05-13.docx              |
| Exhibit D5 - Council Membership Policy - revised draft1           | Exhibit D5 - Council Membership Policy - revised draft1.docx           |
| Exhibit D6 - CNME Residency Handbook - 2017 edition               | Exhibit D6 - CNME Residency Handbook - 2017 edition.pdf                |
| Exhibit D7 - CNME Expense Form 2020                               | Exhibit D7 - CNME Expense Form 2020.docx                               |
| Exhibit D8 - CNME board meeting agenda - May 2020                 | Exhibit D8 - CNME board meeting agenda - May 2020.docx                 |
| Exhibit D9 - CNME FY 2020 Finance Report and FY 2021 Budget       | Exhibit D9 - CNME FY 2020 Finance Report and FY 2021 Budget.xlsx       |
| Exhibit D10 - CNME Appeals Policy - revised draft1                | Exhibit D10 - CNME Appeals Policy - revised draft1.docx                |
| Exhibit D11 - CNME Appeals Board Pool 2020                        | Exhibit D11 - CNME Appeals Board Pool 2020.docx                        |
| Exhibit D12 - CNME Appeals Board Pool Member Bios 2020            | Exhibit D12 - CNME Appeals Board Pool Member Bios 2020.docx            |
| Exhibit D13 - Email to CNME Appeal Board Pool re Training Session | Exhibit D13 - Email to CNME Appeal Board Pool re Training Session.docx |
| Exhibit D14 - Appeal Board Pool Training Agenda                   | Exhibit D14 - Appeal Board Pool Training Agenda.docx                   |
| Exhibit D15 - Appeal Board Training Session Presentation          | Exhibit D15 - Appeal Board Training Session Presentation.pdf           |

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### Criteria:

#### 602.15(a)(3) Academic/Administrator Representatives

#### Response:

There have been no changes to our agency's organizational structure, standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

## Linked Exhibit Files

There are no linked exhibit files.

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### Criteria:

#### 602.15(a)(4) Educator/Practitioner Representatives

#### Response:

COMPOSITION OF THE BOARD AND TRAINING OF MEMBERS. CNME is a programmatic accrediting agency for naturopathic medicine doctoral programs. All of the U.S. programs that are accredited by CNME or have candidacy status are offered by multi-purpose institutions (note, however, that both of the Canadian ND programs are offered by institutions that are currently single-purpose). The CNME Board of Directors is both the agency's policy-making and decision-making body, and includes both naturopathic educators and naturopathic practitioners. The composition of the CNME Board of Directors is spelled out in Policy 1 ("Council Membership") [see Exhibit B11 – Handbook of Accreditation, pp. 84 – 85], which is designed to comply with §602.15 (a)(4). This policy is consistent with CNME's Articles of Incorporation [see Article Fifth, pp. 101 – 102, in Exhibit B11 – Handbook of Accreditation] and the Board Bylaws [see Article I, Sections 2 and 3, on page 105 of Exhibit B11], which both address Board membership requirements (e.g., categories and numbers of members).

Policy 1 establishes three membership categories: "public members" (2 – 3 members), "profession members" (4 – 6 members), and "institutional member representatives" (3 members). Thus, at all times the Board consists of 9 – 12 members. These membership categories were established to ensure that the CNME Board of Directors has, at all times, members who are educators (i.e., faculty members in naturopathic medical programs and academic administrative personnel), naturopathic physicians/NDs whose primary livelihood is derived from the practice of naturopathic medicine, and public members who have no connection with the field of naturopathic medicine. Policy 1 ("Council Membership") also states that "the Council must ensure that the Board of Directors includes significant representation of individuals whose major professional activities include teaching, including one individual whose primary activity is teaching" and also that "the Council must ensure that the Board of Directors includes at least two individuals whose primary professional activity is the practice of naturopathic medicine." See Exhibit B15 – CNME Board Member Directory – Jan. 2020 for a list of Board members current as of January 2020. A current list is always available on the CNME website ([www.cnme.org](http://www.cnme.org)); a list of Board members also published in the CNME Handbook of Accreditation (see page 117), but may not always be up-to-date, depending on the publication

date. As can be seen from Exhibit B16 – Board Member CVs – Jan. 2020, the Council continues to attract highly qualified and experienced individuals to serve on the Board.

Public members are usually drawn from higher education, and have either significant additional experience in accreditation and/or bring knowledge of a specialized area of importance to CNME's work, such as finance or law; they also are not involved with the naturopathic profession (see the following section for more information on CNME public members). Institutional member representatives are usually either ND faculty members or senior academic administrators in ND programs who have prior teaching experience or continue to have a teaching role, and who also have generally had experience as practitioners. Profession members are usually naturopathic physicians who practice in a variety of settings; they sometimes have significant teaching, research and/or academic administrative experience in naturopathic medicine or other fields. Faculty members in ND programs and academic administrative staff with the ND degree typically serve as either profession members or institutional member representatives. At all times, the CNME has both educator and practitioner members on the Board, as well as public members.

The CNME Board has a standing nominations committee the purpose of which is to review potential candidates for appointment to the Board [see Exhibit B17 – CNME Committees – Jan. 2020]. CNME identifies potential members in several ways. Institutional member representatives are drawn from the accredited ND programs on a rotating basis. The CNME executive director informs the institutional/program leadership whenever it is a program's turn to nominate someone to serve on the CNME Board, and provides guidance regarding the range of appropriate qualifications. Once the program nominates someone to serve, the CNME nominations committee reviews the candidate and arranges for the individual to be interviewed by the full Board prior to a decision. In general, the programs have nominated well qualified people to serve.

Potential profession members are identified in a number of ways. Individuals who participate in CNME evaluator training workshops and who serve on evaluation teams are often considered based on their professional background and interest in naturopathic accreditation; CNME also solicits names of potential members from the leadership of U.S. and Canadian national professional societies, as well as other national organizations in the field; current and former Board members may also make suggestions; and on occasion a naturopathic physician may inform the CNME of his/her interest in serving on the Board. The CNME nominations committee reviews potential profession members; interviews individuals who look promising; and makes recommendations to the CNME Board regarding appointments. In all cases, the CNME Board interviews candidates and makes the final decision regarding appointments.

Terms for all Board members are three years in length. The public and profession members may serve two consecutive terms (i.e., six years), and the Board may extend their service for one additional year if they are an officer of the Board whose officer term concludes the following year. The institutional member representatives serve one three-year term. Terms limits for Board members provide for rotation in the agency's leadership, which contributes to the agency's vitality by encouraging innovation and ensuring that decision-making authority is not vested in a few individuals over long periods of time. At the same time, terms are staggered to ensure a reasonable level of continuity and institutional memory.

CNME requires new members to participate in an orientation session conducted by the CNME executive director before they attend their first CNME board meeting as an appointed member in order to become familiar with the specific responsibilities of CNME Board service [see Exhibit B11 – Handbook of Accreditation, p. 84, final paragraph; and Exhibit B18– New Board Member Orientation Agenda]. In the case of a someone who has been nominated to serve as an institutional member representative, the Board sometimes invites this individual to attend a regular Board meeting before his/her term officially begins as another way to become familiar with CNME's operations.

Presently, there are six Board members who serve in the "profession member" category—see Exhibit B15 – CNME Board Member Directory – Jan. 2020]. Four of these profession members are engaged primarily in the practice of naturopathic medicine [see Exhibit B16 – Board Member CVs – Jan. 2020]; Dr. Arvin Jenab, who has a profession member seat, is primarily a faculty member with academic administrative responsibilities and Dr. James Wallace is an academic administrator with a small teaching role. One of our current institutional member representatives—Dr. Hope—is an academic administrator with teaching responsibilities; the other two members in this category—Drs. Beasleigh and Swenson—are academic administrators. [See Exhibit B16 – Board Member CVs for information on the credentials of our individual Board members].

**EDUCATORS AND PRACTITIONERS ON ITS EVALUATION BODIES.** As noted in our response under §602.15(a)(2) above, the Council has a pool of 55 trained evaluators, including educators and practitioners in the field of naturopathic medicine, as well as several educators from other academic fields. Among the educators in the pool are several individuals who are primarily faculty members (see Exhibit B10 – Summary of CNME Evaluator Qualifications – Jan. 2020). It is CNME's routine practice to include educators and practitioners on the evaluation teams that visit ND programs as part of the comprehensive onsite evaluation process for initial candidacy, initial accreditation and reaffirmation of accreditation [see Exhibit B19 – Evaluation Team Members for Bastyr Visit and Exhibit B20 – Evaluation Team Members for SCNM Visit, which show the professional composition of the team members from CNME evaluation visit conducted in 2019]. Generally, we try to assign evaluation team members to review those standards most in line with their professional background [see Exhibit B21 – Bastyr 2019 Evaluation Team Member Assignments and Exhibit B22 - SCNM 2019 Evaluation Team Member Assignments].

#### **Staff Analysis:**

CNME has established policies that are consistent with its Handbook and Board Bylaws regarding the composition of its decision-making body, which in this case is the Board.

At any given time period, there are 9 to 12 members on the Board of CNME, consisting of three membership categories “public members”, “profession members”, and “institutional representatives”. In other words, there are members who are educators, naturopathic physicians, and public members who have no connection with the field of naturopathic medicine. Public members are usually drawn from higher education, who have experience and knowledge in fields that support the CNME’s work, such as finance or law. Professional members are usually ND faculty members or administrators in ND programs. Institutional members are practicing naturopathic physicians and have extensive teaching or administrative backgrounds in naturopathic medicine. Each Board member is allowed to serve three years. In addition, CNME provided documentation to demonstrate its current Board consists of educators and practitioners (Exhibit B16).

For every evaluation visit, the CNME makes sure that the evaluation team consists of educators and practitioners, as stated in the procedures noted in the agency’s narrative and in the Handbook of Accreditation, submitted in 602.15(a)(2). In addition, CNME provided documentation to demonstrate its current site teams include educators and practitioners (Exhibits B19, B20, B21, B22), showing that it is following the regulations set in the Handbook of Accreditation regarding composition of the evaluation team. Furthermore, CNME assigns ND programs and sites that align best with the experiences of the evaluation team. **The agency did not provide any information or documentation concerning the qualifications of appeals panel members.**

#### **Resubmission Response:**

Please see the information and documentation CNME presented in its response to the findings under 602.15(a)(2) concerning the qualifications of appeals panel members; we believe that the response under that section addresses this finding.

### **Linked Exhibit Files**

#### **Exhibit Title**

Exhibit B15 CNME Board Member Directory January 2020  
Exhibit B16 Board Member CVs January 2020  
Exhibit B17 CNME Committees January 2020  
Exhibit B18 New Board Member Orientation Agenda  
Exhibit B19 Evaluation Team Members for 2019 Bastyr Visit  
Exhibit B20 Evaluation Team Members for 2019 SCNM Visit  
Exhibit B21 Bastyr 2019 Evaluation Team Member Assignments  
Exhibit B22 SCNM 2019 Evaluation Team Member Assignments

#### **File Name**

Exhibit B15 CNME Board Member Directory January 2020.docx  
Exhibit B16 Board Member CVs January 2020.docx  
Exhibit B17 CNME Committees January 2020.docx  
Exhibit B18 New Board Member Orientation Agenda.docx  
Exhibit B19 Evaluation Team Members for 2019 Bastyr Visit.docx  
Exhibit B20 Evaluation Team Members for 2019 SCNM Visit.docx  
Exhibit B21 Bastyr 2019 Evaluation Team Member Assignments.docx  
Exhibit B22 SCNM 2019 Evaluation Team Member Assignments.docx

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#### **Criteria:**

##### **602.15(a)(5) Public Representatives**

#### **Response:**

The CNME Board of Directors, the agency’s decision-making body, consists at all times of nine to twelve members. The CNME Articles of Incorporation require that the agency’s Board of Directors include at least one public member for every seven Board members. The “Policy on Council Membership” referenced above requires the CNME Board to have two or three members who are representatives of the public [see Exhibit B11 – Handbook of Accreditation, page 84]. This policy states in relevant part that “Public members are not naturopathic physicians; are not students in a naturopathic medicine program; are not affiliated with a naturopathic medicine program (“affiliated” is defined in the Policy on Potential Conflicts of Interest, see below); are not members of and do not have any other role with an association of naturopathic physicians; and do not have any role in a state’s or province’s licensing activities for naturopathic physicians.”

Potential public members are identified in a number of ways. Individuals who are not involved with the naturopathic profession who participate in CNME evaluator training workshops and serve on evaluation teams are sometimes considered based on their professional background and their general interest and experience in accreditation; CNME also solicits names of potential members from the leadership of U.S. and Canadian national professional societies, as well as other national organizations in the field; current and former Board members may also make suggestions; and the CNME executive director checks with members of the Association of Specialized and Professional Accreditors (ASPA) and reviews the list compiled by ASPA of people interested in serving as a public member of an accrediting agency that is available to ASPA members on the ASPA website. The CNME nominations committee reviews potential public members; interviews individuals who look promising; and makes recommendations to the CNME Board regarding appointments. In all cases, the CNME Board interviews candidates and makes the final decision regarding appointments.

As of the submission date of this petition, two of the Board’s current eleven members—Brian Andrew, JD, MA, and Melissa Woodin, CPA, MBA—are public members [see Exhibit B16 – Board Member CVs, for background information on CNME’s public members]. Additionally, the Board recently appointed a third public member—Susan Tebb, PhD, MSW—to serve as a public member; her term will start in October 2020. As can be seen from her CV [see Exhibit B23 – Dr. Tebb CV], Dr. Tebb is very well qualified to serve on CNME as a public member, given her extensive experience in higher education and accreditation for the field of social work, as well as research and clinical experience.

### Staff Analysis:

According to its “Policy on Council Member”, as stated in its handbook submitted through 602.15(a)(2), CNME must appoint one public member for every seven Board members. They define public members as those who are not ND physicians, are not students of ND programs, and do not play roles in the licensing of ND physicians. However, the agency’s definition does not address the requirement of (3) under the Department’s definition of “Representation of the public”, and the agency did not provide documentation that its public members meet the Department’s definition, stated in section 602.3.

As of May 2020, CNME has two public members, out of its total of eleven Board members. Both are not affiliated with naturopathic medicine programs. They recently appointed a third public member who will join the Board in October 2020.

### Resubmission Response:

In order to address this finding, the CNME board of directors will, at its next meeting (scheduled for November 7-8, 2020), consider a proposed revision to the definition of the term "public member", which is how the CNME denotes a representative of the public: see Exhibit D5 - Council Membership Policy - revised draft1, section titled "Public Members". We believe that the proposed revision (see tracked language) conforms the Department's definition in section 602.3. Also, we believe that the CNME's three current public members meet the requirements set forth in the draft revised Council Membership Policy, as indicated by their filled out conflict of interest forms--see Exhibit D19 - CNME public member completed 2020 conflict of interest forms.

## Linked Exhibit Files

| Exhibit Title  | File Name  |
|--|--|
| Exhibit B23 Dr Tebb CV   | Exhibit B23 Dr Tebb CV.pdf   |
| Exhibit D19 - CNME public member completed 2020 conflict of interest forms | Exhibit D19 - CNME public member completed 2020 conflict of interest forms.pdf |

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### Criteria:

#### 602.15(a)(6) Conflict of Interest

#### Response:

CNME has adopted two policies that we believe provide clear, effective and reasonably comprehensive controls against conflicts of interest. The first policy is set forth in paragraph c (“Conflict of Interest”) in Article Seventh of the Articles of Incorporation [see Exhibit B11 – Handbook of Accreditation, pages 102 – 103]. It is primarily geared to guard against financial conflicts of interest in the approval of contracts and other transactions of the Board of Directors and to prevent self-dealing, and requires a Board member with a conflict of interest to disclose his/her interest and recuse himself/herself from voting on any matters related to the interest in question. CNME has also adopted a policy on "Potential Conflicts of Interest" [see Exhibit B11, Policy #2, page 85] that requires Board members to recuse themselves from voting on recognition decisions or other actions related to ND programs if they have a conflict of interest due to a current or prior affiliation with a CNME accredited or candidate program. A person is “affiliated” with a naturopathic medicine program if “he or she, or a member of his or her immediate family (spouse, parent, child, brother, or sister): 1. Is currently—or during the last seven years has been—an officer, director, trustee, employee, contractor, or consultant of the institution where the naturopathic medicine program is located; 2. Has been a student in the naturopathic medicine program within the last three years; or 3. Has had during the last seven years other dealings with the institution at which the program is located from which he or she has or will receive cash or property.” The policy on Potential Conflicts of Interest also requires a Board member to declare a conflict of interest, or the appearance of one, if a conflict of interest may exist for some other reason besides an affiliation. Another provision of the policy allows a representative of the program under consideration, CNME’s executive director, or any Board member to request that the Board consider whether a Board member who has not declared a conflict of interest—or the appearance of one—may, in actuality, have one. Additionally, under this policy, no member of an evaluation team, no consultant engaged by CNME, and no member of its administrative staff may be affiliated with an accredited or a candidate program, or with an applicant program. To emphasize that the policy on Potential Conflicts of Interest applies to evaluation team members, we note this requirement on p. 15 of the Handbook of Accreditation in the section “Function and Composition,” third paragraph.

To support awareness and enforcement of the conflict of interest policies, all Board members and the CNME executive director are required to complete a “Conflict of Interest Statement and Disclosure Form” on an annual basis, a process we initiated in 2019 [see Exhibit B24 – CNME Conflict of Interest Form]. Additionally, prior to discussions and votes on recognition actions and any other decision matters pertaining to CNME-accredited or candidate ND programs or programs seeking candidacy, the CNME president asks all Board members to review the policy on Potential Conflicts of Interest and any members with a conflict to leave the meeting room prior to the discussion and vote.

The Council takes two steps to ensure that the members of an evaluation team do not have a conflict of interest with a program that they will be visiting: (i) before considering individuals for appointment to an evaluation team, the CNME executive director reviews the CVs of potential team members to see if any of them have a connection with the program/institution that would constitute a conflict of interest, and (ii) the executive director checks with the program’s leadership to find out whether there are any concerns about potential team members’ conflicts of interest.

The CNME uses consultants for the following limited purposes: website support, financial reviews and audits, bookkeeping, and legal advisement regarding the ED recognition criteria and occasionally on other matters. None of these consultant activities have ever raised any conflict of interest issues.

## Linked Exhibit Files

### Exhibit Title

Exhibit B24 CNME Conflict of Interest Form

### File Name

Exhibit B24 CNME Conflict of Interest Form.docx

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### Criteria:

#### 602.15(b) Recordkeeping

### Response:

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

## Linked Exhibit Files

There are no linked exhibit files.

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### Criteria:

#### 602.16(a)(1)(i) Student Achievement

### Response:

The CNME has a single set of accreditation standards for preaccreditation (CNME's "candidacy" status), initial accreditation, and reaccreditation; they were developed—and have been revised and refined over the years—with three goals in mind: promoting high quality naturopathic medical education, ensuring that graduates have sufficient knowledge and skills to enter a licensed medical profession, and conforming to ED's recognition criteria [see Exhibit B11, Part Four, pp. 34 – 51].

There are several CNME accreditation standards aimed at addressing success with respect to student achievement in relation to a program's mission. Accreditation Standard I ("Program Mission and Outcomes") sets broad parameters for naturopathic doctoral (ND) programs regarding a program's mission by stating that "a naturopathic medicine program ... has a clear, concise and realistic program mission statement (or equivalent) that identifies what it intends to accomplish, and encompasses the educational preparation of naturopathic physicians/doctors," and also that "reflects doctoral level education"; furthermore, Standard I requires the program mission statement "be accompanied by a set of program outcomes" that are "consistent with the mission statement and guide the program in establishing specific student achievement/learning goals and objectives and other relevant outcomes of the program" [see Exhibit B11, page 34]. It should be noted that since naturopathic medicine is a licensed profession in 25 U.S. states and jurisdictions and five Canadian provinces, requirements for student achievement within ND programs are largely shaped by professional requirements for practice—including passing a standardized licensing exam and working within the naturopathic scope of practice.

The CNME's requirements in regard to student achievement are given greater specificity in two subsequent standards: Standard VI ("Program of Study") and Standard VII ("Assessment of Student Learning and Program Evaluation"); additionally, Standard IV ("Program Faculty") supports student achievement at the doctoral degree level by requiring faculty to "have appropriate education and experience for their teaching positions and responsibilities in the program. Individual faculty members must possess appropriate advanced or professional degrees—usually terminal degrees in their field—and any other qualifications required to provide doctoral-level instruction in their assigned areas" [see Exhibit B11, Standard IV, Section A-1, page 37]. While CNME's accreditation standards provide the baseline requirements aimed at ensuring student academic and professional success, they also provide flexibility to accredited and candidate ND programs to develop their own unique approaches to naturopathic education.

The Program of Study standard [see Exhibit B11, pp. 42 – 47] requires the following: "The program of study, including the academic and clinical components, is competency based. A naturopathic medicine program clearly articulates the required competencies/learning outcomes of individual courses, consistent with its program mission and program outcomes, which it considers necessary for a student to graduate as a competent doctor of naturopathic medicine." [see Exhibit B11, p. 42, paragraph A-1]. Furthermore, the Program of Study standard specifies in detail the basic science, biomedical science and clinical knowledge that a graduate of an ND program must possess, as well as the clinical skills and abilities. To ensure that programs are mindful of the importance of clearly articulating expected learning outcomes and competencies, Standard VI also requires each course syllabus to contain certain types of information, including "the learning outcomes of the course in specific terms, and the educational competencies to be attained"—see page Part A, Section 5.c, on page 43.

Standard VII ("Assessment of Student Learning and Program Evaluation") [see Exhibit B11, pp. 48 – 49] requires generally that an ND program "demonstrates a commitment to optimal student achievement/learning and academic and professional success through a focus

on student learning outcomes and continuous program improvement based on outcomes data.” Section A-1 of this standard requires that ND programs “maintain an assessment plan for student learning....” The assessment plan must “(i) provide a method for evaluating each student’s academic and clinical performance and achievement in relation to the program’s educational requirements and outcomes, including student competencies/learning outcomes in individual courses, and (ii) incorporate this data into the program level assessment and evaluation.” Section B-1 of this standard requires that ND programs “maintain a program level assessment plan that provides for a periodic assessment and evaluation of overall program effectiveness in relation to the program mission and outcomes.” Standard VII requires that each accredited/candidate ND program incorporate into its assessment plan its own measures for assessing both individual student academic performance and the overall program of study; Sections A-4 and B-6 of Standard VII (see pp. 48 & 49) provide examples a of range of direct and indirect assessment measures that the CNME considers useful for ND programs. Standard VII also sets forth two student success benchmarks for programs: (i) a program is required, on average, to graduate 75% of its students within the completion deadline set by the program (usually six or seven years) over a five-year period; and (ii) first-time test-takers of the NPLEX exam—the licensing exam for NDs in the U.S. and Canada (with the exception of Ontario, which has its own exam)—must attain a pass rate of 70%, on average, over a five-year period on both the biomedical and clinical sciences portions of the exam [see Exhibit B11, Sections B-4 and B-5, on page 49]. The NPLEX pass rate benchmark was originally arrived at in consultation with ND programs and the organization responsible for NPLEX licensing exam (the North American Board of Naturopathic Examiners), and took into account practices in other healthcare fields. The completion rate benchmark was also arrived at in consultation with the ND programs and took into account other healthcare fields. Both were last reviewed during the comprehensive review of standards completed in 2016. Generally speaking, CNME evaluation teams review a program’s assessment plan to see whether it seems appropriate to the needs of the program, has been fully implemented, and is producing useful information that is incorporated into program planning.

There are a number of steps the CNME takes to support the agency in effectively evaluating and monitoring programs’ compliance with CNME’s accreditation standards: (i) Part Five of the CNME Handbook of Accreditation contains a “Self-Study Guide,” which provides detailed guidelines regarding the self-study process and self-study report [see Exhibit B11, pp. 55 – 83]; (ii) prior to a program beginning the self-study process, the CNME executive director provides a self-study orientation session via conference call with a program’s self-study steering committee for the purpose or reviewing the Self-Study Guide (see page 56 of the Handbook of Accreditation); (iii) the program submits a comprehensive self-study report [See Exhibit C1 – Bastyr U. 2019 Self-Study Report for Reaccreditation, as an example]; (iv) the CNME sends an evaluation team of 4 or 5 individuals to conduct an onsite review of the program over a period of two-and-a-half days; the team uses a set of worksheets to ensure thorough review of each accreditation standard [see Exhibit C2 – Sample Evaluator Worksheet]; (v) the team issues a detailed written report that contains its findings, including the basis for its findings [see Exhibit C3 – CNME Evaluation Team Report for Bastyr – 2019] (see pages 16 – 17 of the Handbook of Accreditation); (vi) the program is given an opportunity to both correct factual errors in the draft team report, and to submit a “Formal Institutional Response” (FIR) if it wishes to contest team findings in the final version [see Exhibit C4 – Email Exchange with Bastyr re Correction of Errors and FIR] (see pages 17 – 18 of the Handbook); (vii) the CNME Board holds an accreditation hearing to which program representatives are invited; this hearing provides an opportunity for the Board to seek clarification of information in the written materials and for the program to similarly clarify any information it considers important for the Board to consider; (viii) prior to the Board’s accreditation hearing, the public is provided an opportunity to comment on the program (see page 18 of the Handbook) and (viii) following the hearing, the CNME Board makes a decision on candidacy, accreditation or reaccreditation, and the CNME executive issues a decision letter outlining the Board decision, which is sent to the program [see Exhibit C5 – CNME 2019 Decision Letter re Bastyr ND Program].

As noted above, the CNME calls its pre-accreditation status “candidacy”; the agency uses the same standards for candidacy and accreditation. The most recent application for candidacy took place over the course 2014 – 2015. In May 2014, the Universidad del Turabo in Gurabo, Puerto Rico, submitted a candidacy self-study report [see Exhibit C6 – U. Turabo 2014 Self-Study Report and Exhibit C7 – U. Turabo 2014 Self-Study Report Addendum; note that the addendum addressed deficiencies in the self-study report]. The evaluation team issued a team report following the site visit [see Exhibit C8 – CNME 2015 Eval. Team Report for U. Turabo], and U. Turabo submitted a Formal Institutional Response to the team report [see Exhibit C9 – U. Turabo 2015 Formal Institutional Response]. Following the hearing for initial candidacy, the CNME Board voted to grant initial candidacy [see Exhibit C10 – CNME 2015 Decision Letter to U. Turabo re ND Program].

## Linked Exhibit Files

| Exhibit Title   | File Name  |
|---|--|
| Exhibit C1 Bastyr U 2019 Self Study Report for Reaccreditation        | Exhibit C1 Bastyr U 2019 Self Study Report for Reaccreditation.docx        |
| Exhibit C2 Sample Evaluator Worksheet                                 | Exhibit C2 Sample Evaluator Worksheet.docx                                 |
| Exhibit C3 CNME 2019 Evaluation Team Report for Bastyr                | Exhibit C3 CNME 2019 Evaluation Team Report for Bastyr.docx                |
| Exhibit C4 Email Exchange with Bastyr re Correction of Errors and FIR | Exhibit C4 Email Exchange with Bastyr re Correction of Errors and FIR.docx |
| Exhibit C5 CNME 2019 Decision Letter re Bastyr ND Program             | Exhibit C5 CNME 2019 Decision Letter re Bastyr ND Program.pdf              |
| Exhibit C6 U Turabo 2014 Self Study Report                            | Exhibit C6 U Turabo 2014 Self Study Report.docx                            |
| Exhibit C7 U Turabo 2014 Self Study Report Supplement                 | Exhibit C7 U Turabo 2014 Self Study Report Supplement.pdf                  |
| Exhibit C8 CNME 2015 Evaluation Team Report for U Turabo              | Exhibit C8 CNME 2015 Evaluation Team Report for U Turabo.docx              |
| Exhibit C9 U Turabo 2015 Formal Institutional Response                | Exhibit C9 U Turabo 2015 Formal Institutional Response.pdf                 |
| Exhibit C10 CNME 2015 Decision Letter to U Turabo re ND Program       | Exhibit C10 CNME 2015 Decision Letter to U Turabo re ND Program.pdf        |

**Criteria:****602.16(a)(1)(ii) Curricula****Response:**

CNME accreditation Standard VI (“Program of Study”) [see Exhibit B11 – Handbook of Accreditation, pp. 42 – 47] outlines the required basic science, biomedical science, clinical science, and therapeutic subject matter that must be included in an accredited/candidate ND program, as well as the clinical skills required for competent practice as a naturopathic physician; generally, the first and second years of a 4-year ND program are primarily focused on academic coursework (with some clinical training integrated into the educational experience), while the third and fourth years are primarily focused on clinical training. Additionally, the Program of Study standard specifies a range of required competencies for a graduate of the program, and sets forth the requirements regarding the total length of an ND program (a minimum of 4,100 clock hours), the length of the clinical training component within the ND program (a minimum of 1,200 clock), and the assignment of accredits (see Section A-2, pp. 42 – 43).

An important aspect of reviewing a self-study report and conducting an evaluation visit is the review of an institution’s ND program to make sure that it covers all of the required subject matter and provides a sufficiently robust clinical experience. To this end, an evaluation team reviews the course syllabi of the courses in the program and spot-checks clinical records. Additionally, the team observes aspects of the clinical training, meets with students and faculty to hear their perspectives on the program’s strengths and weaknesses, and reviews graduate performance on the national licensing exam.

### **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:****602.16(a)(1)(iii) Faculty****Response:**

CNME accreditation Standard IV (“Program Faculty”) addresses faculty sufficiency, qualifications, conditions of employment, performance evaluation, participation in program development and institutional governance, and ongoing professional development [see Exhibit B11 – Handbook of Accreditation, pp. 37 – 39]. This standard requires, among other things, that faculty “have appropriate education and experience for their teaching positions and responsibilities in the program. Individual faculty members must possess appropriate advanced or professional degrees—usually terminal degrees in their field—and any other qualifications required to provide doctoral-level instruction in their assigned areas.” To ensure quality clinical training, clinic rotations must be under the supervision of licensed practitioners a majority of whom have had five or more years of clinical experience. During onsite visits, the qualifications and performance of individual faculty are evaluated through a review of faculty rosters (which include information on the credentials and subject areas of each faculty member), review of a sampling of faculty personnel files, and observation in the teaching clinic. Evaluators also meet with groups of faculty (without supervisory personnel present) to discuss issues such as faculty involvement with academic planning, opportunities for professional development, faculty involvement in setting admissions requirements and student selection, and so on; evaluators also meet with students to hear their perspectives on the quality of faculty in their experience. Programs must assess during the self-study process how well student and institutional needs are being served by the faculty and how well the program complies with CNME’s requirements pertaining to faculty.

### **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:****602.16(a)(1)(iv) Facilities/Equipment/Supplies****Response:**

CNME’s requirements regarding facilities, equipment, and supplies are primarily contained in Standard X (“Physical Resources”) [see Exhibit B11 – Handbook of Accreditation, page 51]. This standard requires that the physical resources for a naturopathic medicine program be planned and developed in accordance with a comprehensive plan. Among the specific areas covered in the standard are: the sufficiency and maintenance of instructional facilities; adequacy of faculty offices; sufficiency of equipment and supplies to meet the needs of staff, faculty and students; maintenance of facilities and grounds; health and safety; accessibility; and protection of records. Note that Part D (“Clinic Administration, Resources, and Facilities”) of Standard VI (“Program of Study”) addresses the adequacy of space (e.g., patient treatment rooms) and equipment necessary to conduct the clinical training component of an ND program [see Exhibit B11, page 47], and Section D of Standard IX (“Library and Learning Resources”) addresses the adequacy of workspace for faculty and staff, and study space for students (see page 51).

Among the tasks of an evaluation team is a careful onsite review of an ND program's physical resources—including a complete tour of portions of the campus that serve the needs of the ND program and visits to a sampling of offsite training facilities—to determine their sufficiency and appropriateness. Programs must assess during the self-study process the adequacy of the institution's physical resources and how well the program complies with CNME's requirements pertaining to physical resources. The evaluation team also meets with groups of students, faculty and administrative staff to hear their perspectives on the adequacy of the facilities and equipment in regard to their respective needs and interests.

## Linked Exhibit Files

There are no linked exhibit files.

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### Criteria:

#### 602.16(a)(1)(v) Fiscal/Administrative Capacity

#### Response:

FISCAL CAPACITY. Fiscal capacity is evaluated under Standard III, "Planning and Financial Resources" [see Exhibit B11 – Handbook of Accreditation, pp. 36 – 37]. This standard requires programs to demonstrate adequate and stable funding, as well as sound financial management, planning and development. An important aspect of the standard on financial resources is on making certain that "the institution in which the program is located ... demonstrate[s] adequacy and stability of financial resources to support the program" (see Section B-1, page 36). Among other things, "the program must be provided with sufficient financial and other resources to (i) achieve its mission, (ii) meet existing program commitments, and (iii) provide adequately for instruction, research and scholarship, administration, learning resources, student services and activities, maintenance, equipment, supplies, and other specific needs and functions" (see Section C-1, page 37). The Self-Study Guide lists some of the information, analyses, and appraisals that should be included in the self-study report in regard to Standard III, including the most recent audited financials for the institution, as well as the current fiscal year budget and projected budgets for the next two fiscal years [see Exhibit B11, page 64].

Meetings with faculty, staff and students are an important way to gain some insight into whether a program is being provided with adequate resources. For example, faculty and staff might raise issues around excessive workloads and adequacy of support staff that may indicate funding issues; and students may bring up issues around adequacy and availability of support services and the level of experience of faculty.

Given the speed with which financial exigencies can sometimes arise within higher education institutions due to unanticipated drops in enrollment and other factors, the CNME also carefully monitors on an annual basis the financial soundness of the institutions that offer CNME-accredited and candidate ND program, as well as the annual funding allotted to the programs. Each program is required to include the institution's audited financial statements and the auditor's report as an addendum to the annual report it submits to CNME. A program must also include with its annual report the institution's and naturopathic program's budgets for the current and prior fiscal years [see Exhibit C11 – 2019 Annual Report Form for ND Programs, page 2]. Furthermore, CNME has created a set of financial ratios/benchmarks appropriate to higher education institutions that the programs are required to submit as part of the annual report [see Exhibit C12 – Financial Metrics Worksheet Template].

ADMINISTRATIVE CAPACITY. Standard II, "Organization, Governance and Administration," on pages 35 – 36 of the Handbook on Accreditation, is the main standard as regards administrative capacity. Standard II sets forth requirements pertaining the institution's system of governance, the governing board, and the chief executive officer (the institution's president), as well as the ND program's chief administrative officer (e.g., program dean, VP for academic affairs) and the program's administrative staff. The accompanying Self-Study Guide calls for detailed assessments in each area. Administrative capacity is also addressed either explicitly or implicitly in other CNME accreditation standards, including: (i) Standard V, "Student Services," on pages 39 – 42, with regard to a range of required administrative services, including admissions, academic counseling, financial aid, etc.; (ii) Standard VIII, "Research and Scholarship," pp. 49 – 50, with regard to administrative capacity to engage in research (e.g., research committee, institutional review board); and (iii) Standard IX "Library and Learning Resources," pp. 50 – 51, with regard to a sufficient number of appropriately credentialed staff. In practice, CNME is interested in monitoring the adequacy and stability of administrative personnel at CNME-recognized programs to ensure that students are appropriately supported as they move through the program.

## Linked Exhibit Files

#### Exhibit Title

Exhibit C11 2019 Annual Report Form for ND Programs  
Exhibit C12 Financial Metrics Worksheet Template

#### File Name

Exhibit C11 2019 Annual Report Form for ND Programs.docx  
Exhibit C12 Financial Metrics Worksheet Template.xlsx

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### Criteria:

#### 602.16(a)(1)(vi) Student Support Services

#### Response:

CNME Accreditation Standard V (“Student Services”) on pages 39 – 42 of the Handbook of Accreditation [See Exhibit B11] covers the required student support services that CNME considers essential to promoting a valuable educational experience in—and successful completion of—an ND program. Section A-1 of this standard states: “The program shall provide student services and activities that reflect the program’s mission, assist students in successfully completing the program, support positive student morale, and support students in the achievement of personal and professional growth. Student services shall include, at a minimum, well-developed programs in the following areas: (i) admissions, (ii) orientation, (iii) advisement and academic counseling, (iv) financial aid (if offered), (v) tutorial services, and (vi) career development services.” As with other standards, the CNME expects CNME-accredited/candidate ND programs, and programs seeking candidacy, to provide a thorough self-study report that describes how they meet the standard and includes supporting documentation; the Self-Study Guide (see Part Five of the Handbook of Accreditation) provides guidance to programs on how to address this standard. During the evaluation visit, the team meets with students from every year in the program to find out how well the student services meet their needs; additionally, the team inspects various student records and other documents as another way to get a handle on the adequacy of student services as regards CNME’s requirements. Accreditation Standard IX (“Library and Learning Resources”), found on pp. 50 – 51 of the Handbook of Accreditation, sets forth the requirements for this important area of student support services. In general, CNME has found student support service to be a strength of the institutions that offer CNME-accredited/candidate programs.

## Linked Exhibit Files

There are no linked exhibit files.

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### Criteria:

#### 602.16(a)(1)(vii) Recruiting & Other Practices

#### Response:

RECRUITING AND ADMISSIONS PRACTICES. Part B of CNME Accreditation Standard V (“Student Services”) [see Exhibit B11, page 40] sets forth a number of requirements regarding admissions and student recruitment. For example, Section B-1 states: “The program shall have a published student admissions policy that (i) reflects the program’s mission and outcomes, and (ii) clearly specifies the educational prerequisites, personal characteristics and minimum qualifications of applicants that the program considers necessary for academic and professional success. The program shall endeavor to select students who possess the intellectual capacity, integrity and personal characteristics necessary to become effective naturopathic physicians/doctors. The admissions process should include an in-person interview with applicants.” As another example, Section B-6 states: “Recruitment and admissions activities shall be conducted with honesty and integrity. The content of marketing materials and of any representations made to prospective students must be clear and accurate.” The CNME carefully reviews admissions materials and practices in the context of the accreditation and reaccreditation processes to make sure that ND programs accurately represent themselves and admit students capable of successfully completing the program. In addition to reviewing written admissions materials (catalogs, websites, etc.), site visitors review admissions rates (i.e., percent of applicants admitted), persistence rates, pass rates on the national licensing exam (NPLEX), and the rigor of the curriculum; they also interview faculty and program academic staff to find out the degree to which they are involved in student selection (to make sure that admission of students is not driven by revenue concerns), and interview students, faculty and staff to hear their perspectives on the quality of students in the program.

ACADEMIC CALENDARS, CATALOGS, AND PUBLICATIONS. Part G of CNME Accreditation Standard V (“Student Services”) [see Exhibit B11, page 42] states that the program must make certain official publications available to public (e.g., catalog, calendar, student handbook or other comparable publications, either in hardcopy form, electronically, or both). Section G-1 lists in detail the information that must be contained in the program’s publications; the intent of this list is to ensure that potential applicants are fully apprised of: (i) the costs associated with enrolling in an ND program and the requirements for successfully completing it, (ii) their rights and responsibilities as students, (iii) the program’s/institution’s adherence to legal requirements, and (iv) other information pertinent to making an informed decision to enroll (e.g., accreditation status, qualifications of faculty, additional charges related to courses utilizing information and communication technology).

GRADING. Standard V (“Student Services”), Section G-1k, states that a program must accurately set forth its “grading and attendance policies,” and Standard VI (“Program of Study”), Section A-5f, of states that a course syllabus must include “the type of grading system used.” Finally, Standard XI (“Continuing Medical Education”), Section A-4 states that “Accurate records of ... grades ... are maintained” for continuing medical education courses. While the above are the only explicit references to “grades” and “grading” in CNME’s accreditation standards, there are other provisions in the standards that pertain generally to the use of some sort of grading system as an aspect of assessment; for example, Standard VII (“Assessment of Student Learning and Program Evaluation”), Section A-1 states: “The program must maintain an assessment plan for student learning. This plan must (i) provide a method for evaluating each student’s academic and clinical performance and achievement in relation to the program’s educational requirements and outcomes, including student competencies/learning outcomes in individual courses....” Section A-2 of the same standard states: “The program utilizes both formative and summative processes to evaluate student learning. The evaluation processes are fair, emphasize objective techniques and approaches, and are applied consistently.” And Section A-3 of the same standard states: “Evaluation of student clinical performance is (i) referenced to specific criteria, (ii) performed regularly, and (iii) incorporates a variety of measures of knowledge and competence.” Thus, while the CNME does not mandate a specific grading system, it expects that all programs will have in place some sort of reasonably objective evaluation system.

ADVERTISING. Standard V, Section G-2, explicitly references “advertising” as follows: “Publications, advertising and other

communications that concern the institution's programs, services, activities and personnel must provide complete, accurate and clear information regarding the naturopathic medical program. Courses and faculty not available during a given academic year must be identified clearly. Publications and advertising must accurately represent employment, career and licensure opportunities." As noted above, elsewhere in Standard V it is stated that programs' marketing materials must be "clear and accurate." CNME site visit teams, and the CNME in general, are mindful that honest and accurate public representations are crucial to informed consumer choice when it comes to choosing an educational program in any field.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.16(a)(1)(viii) Program Length**

#### **Response:**

MEASURES OF PROGRAM LENGTH. Section A-2 of Standard VI (Program of Study") specifies the overall length of an ND program as follows: "A naturopathic medicine program is typically presented in a quarter, trimester or semester format over a minimum time period of four calendar years.... Including clinical education, a naturopathic medicine program requires a minimum of 4,100 clock hours. Assignment of credits is consistent with accepted practices in higher education." The CNME considers this length to be consistent with doctoral-level medical training programs in other fields; this is borne out by the fact that all of the US-based naturopathic doctoral programs have state authorization to grant the ND degree. Given the importance of ensuring that ND programs include a robust clinical training component, Section C-5 of Standard VI states "The program's clinical education component provides at least 1,200 clock hours of clinical training involving patient contact in residential clinical settings." The objective of the ND degree is to train naturopathic doctors; this indicated in Standard I, Section A-1, on page 34 of the Handbook of Accreditation, which states that the "program mission statement ... encompasses the educational preparation of naturopathic physicians/doctors."

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.16(a)(1)(ix) Student Complaints**

#### **Response:**

CNME addresses the topic of student complaints in three separate places in the Handbook of Accreditation [see Exhibit B11]. Section A-4 of Standard V ("Student Services"), page 39, states: "The program must publish in the student handbook, or a comparable publication, fair and efficient policies and procedures for reviewing and responding to formal complaints and grievances made by students, and must maintain a record of their disposition during the preceding three-year period—or from the date of the Council's last comprehensive on-site visit, if more than three years ago—demonstrating that these complaints and grievances were handled fairly and in accordance with the published policies and procedures." Section A-4 is given greater specificity in CNME Policy 6 ("Maintaining a Record of Student Complaints"), which is found on page 91 of the Handbook of Accreditation; among other things, this policy specifies that a program must "... review and respond in a timely manner to student complaints submitted in accordance with the published policies and procedures," and that "during a comprehensive visit, an on-site team shall review student grievances and complaints contained in the program's complaint record to determine the adequacy and appropriateness of the program's response in light of the program's written procedures. The Council may also conduct such a review at any other times as it may deem necessary." Finally, under Policy 4 (see pp. 88 – 89) in the Handbook of Accreditation, the Council provides an opportunity for students (and others) to submit a complaint about a CNME-accredited/candidate program directly to the Council as follows: "The Council will ... review a formal, written signed complaint against a CNME-accredited or candidate program, provided that the complaint (i) is adequately documented, (ii) indicates a lack of compliance with a specific section or sections of the Council's eligibility requirements, accreditation standards or policies, and (iii) does not pertain to facts or circumstances that transpired more than four years prior to the submission of the complaint."

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.16(a)(1)(x) Title IV Responsibilities**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that would potentially bring our agency into noncompliance with any of the requirements of this section of the ED's criteria for recognition.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.16(a)(2) Preaccreditation Standards**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.16(b)(c) Distance/Correspondence Education**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.17(a) Mission & Objectives**

#### **Response:**

MAINTAINS CLEARLY SPECIFIED EDUCATIONAL OBJECTIVES. As noted in an earlier section of this petition, CNME's Standard I ("Mission and Program Outcomes"), a program is required to have "a clear, concise and realistic program mission statement (or equivalent) that identifies what it intends to accomplish, and encompasses the educational preparation of naturopathic physicians/doctors." The mission must be accompanied by a set of "program outcomes." The outcomes "must be consistent with the mission statement and guide the program in establishing specific student achievement/learning goals and objectives and other relevant outcomes of the program" [see Exhibit B11 – Handbook of Accreditation, p. 34]. Standard VI ("Program of Study"), Section A-1, elaborates on this requirement as follows: "The program of study, including the academic and clinical components, is competency based. A naturopathic medicine program clearly articulates the required competencies/learning outcomes of individual courses, consistent with its program mission and program outcomes, which it considers necessary for a student to graduate as a competent doctor of naturopathic medicine. The program also incorporates any competencies formally adopted by CNME" [see Exhibit B11, page 42]. As also noted in an earlier section, CNME Accreditation Standard VI requires each course syllabus to contain "the learning outcomes of the course in specific terms, and the educational competencies to be attained"—see page Part A, Section 5.c, on page 43. As noted earlier, since naturopathic medicine is a licensed profession in many U.S. and Canadian jurisdictions that requires passing a standardized licensure exam and practicing within the constraints of a fairly standardized scope of practice, all ND programs share many learning objectives in common; this is evidenced by a document titled "AANMC Core Competencies of the Graduating Naturopathic Student" that was developed by Council of Chief Academic and Clinical Officers (CCACO), which operates under the auspices of the Association of Accredited Naturopathic Medical Colleges (AANMC) [see Exhibit C15 - AANMC Core Competencies for Graduating Naturopathic Students – 2019 edition]. Thus in practice, the learning objectives of ND programs both reflect the needs and requirements of a licensed medical profession and therefore share a certain degree of commonality while, at the same time, differ to some degree from institution to institution based on the areas that individual programs may wish to emphasize (e.g., cultivate the development and dissemination of new knowledge in naturopathic medicine through education, scholarship or research).

An evaluation team that visits an ND program and, ultimately, the Council's Board of Directors have the responsibility for evaluating whether the program maintains clearly specified educational objectives that are consistent with its mission and appropriate in light of ND degree it awards. The program prepares a self-study report based on guidance contained in the CNME Self-Study Guide (Part Five of the Handbook of Accreditation). The evaluation team reviews the self-study report, visits the campus to determine whether the self-study

report accurately reflects the program's practices, and issues an evaluation team report that—among other things—evaluates the program's compliance with the Standard on Mission and Objectives and the Standard on Core Curriculum; the team uses a set of worksheets [see Exhibit C2] to ensure a thorough review. [See Exhibit C1 – Bastyr U. 2019 Self-Study Report for Reaccreditation, sections on Standards I and VI and Exhibit C3 – CNME Evaluation Team Report for Bastyr – 2019; see also Exhibit C13 – U. of Bridgeport 2018 Self-Study Report and Exhibit C14 – CNME 2018 Site Team Report for U. of Bridgeport Reaccreditation Visit.] The Board reviews the self-study report and the evaluation team report, questions program representatives during a formal hearing, considers both written feedback (i.e., the Formal Institutional Response) and oral feedback from the program, and then makes its final decision on candidacy/accreditation.

**SUCCESS IN ACHIEVING STATED OBJECTIVES.** Part of CNME's accreditation process is evaluating whether an ND program is successful in achieving its stated objectives. As noted in a previous section, CNME Standard VII ("Assessment of Student Learning and Program Evaluation") requires programs to have in place plans that address assessment of student learning at two levels: the individual student level and program level. Part B-1 of this standard is, in particular, relevant to the task of determining whether a program is successful in achieving its stated objectives; it states: "The program must maintain a program level assessment plan that provides for a periodic assessment and evaluation of overall program effectiveness in relation to the program mission and outcomes. The program must regularly use the information generated through its assessment and evaluation processes to make related changes and improvements in its program of study, allocation of resources, and academic and institutional policies and procedures." When an evaluation team reviews a program's self-study report and carries out an onsite visit, it reviews the program-level assessment plan and various outcomes data that the plan references; among other things, the team reviews whether a plan is in place, has been implemented, allows the program to determine its success in achieving its objectives, and has been used to make changes where needed.

**MAINTAINS DEGREE REQUIREMENTS THAT CONFORM TO COMMONLY ACCEPTED STANDARDS.** The following are several of the reasons why the CNME believes its requirements for the ND degree conform to accepted standards. (1) CNME-accredited/candidate ND programs prepare graduates for licensed medical practice as naturopathic doctors/physicians; currently, all 25 jurisdictions in the U.S. (22 states, Puerto Rico, Washington, DC, and the Virgin Islands) that license naturopathic doctors require graduation from a CNME-accredited/candidate program (or an equivalent accredited program) as a basis for granting a license along with passing the licensing exam. (2) As noted in an earlier section, CNME requires ND programs to be residential, and to be 4,100 clock hours in length taught over a 4-year period; these requirements are similar to requirements for doctoral level training in other medical professions (e.g., chiropractic, conventional medicine, osteopathy). (3) CNME-accredited/candidate ND programs have been authorized to grant the doctoral degree by the higher education agencies in the states in which the programs are located. (4) The U.S. institutions that offer ND programs have institutional accreditation status with their respective regional/national accrediting agencies, which indicates acceptance by these agencies of the ND degree as being an appropriate educational offering. (5) Finally, enrollment in and graduation from a CNME-accredited/candidate ND program is a requirement for taking the national licensing exam (NPLEX).

### Linked Exhibit Files

| Exhibit Title   | File Name   |
|---|---|
| Exhibit C13 U of Bridgeport 2018 Self Study Report                                    | Exhibit C13 U of Bridgeport 2018 Self Study Report.pdf                                    |
| Exhibit C14 CNME 2018 site team report for U of Bridgeport reaccreditation visit      | Exhibit C14 CNME 2018 site team report for U of Bridgeport reaccreditation visit.pdf      |
| Exhibit C15 AANME Core Competencies for Graduating Naturopathic Students 2019 edition | Exhibit C15 AANME Core Competencies for Graduating Naturopathic Students 2019 edition.pdf |

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#### Criteria:

##### 602.17(b) Self-Study

#### Response:

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### Linked Exhibit Files

There are no linked exhibit files.

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#### Criteria:

##### 602.17(c) On-Site Review

#### Response:

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### Linked Exhibit Files

There are no linked exhibit files.

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**Criteria:**

**602.17(d) Response to Site Review**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.17(e) Agency Analysis of Information**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.17(f) Report on Compliance & Student Achievement**

**Response:**

As noted earlier, following a comprehensive evaluation visit for candidacy, initial accreditation or reaffirmation of accreditation, a CNME evaluation team issues a detailed, written evaluation team report [as examples, see Exhibit C3 – CNME Evaluation Team Report for Bastyr – 2019 and Exhibit C14 – CNME 2018 site team report for U. of Bridgeport reaccreditation visit]. The content of the report is described as follows in Exhibit B11 – Handbook of Accreditation, on pp. 16-17, under the heading “Evaluation Team Report”: “During the evaluation visit, the evaluation team formulates its findings and its confidential recommendation to the Council regarding a decision on candidacy or accreditation. Following the visit, the evaluation team writes a comprehensive report that presents: (i) detailed assessments of the naturopathic medicine program’s compliance with each of the Council’s standards and policies, noting areas where improvements are needed; and (ii) an assessment of the program’s performance with respect to student achievement. The team uses the Council’s Evaluation Team Report Template as a guide to ensure that the report is complete.”

Program areas needing improvement are denoted in two different ways: (i) If an evaluation team determines that a program is not in compliance with an accreditation standard or a criterion within a standard, then it includes in the report a “recommendation” that specifies what the program must do to bring itself into compliance; and (ii) If an evaluation team observes a weakness that does not, in its estimation, amount to a non-compliance—but could become a non-compliance if the weakness becomes more pronounced—then the team may denote the weakness as an “area of interest.” The Evaluation Team Report Template provides an example of both a recommendation and an area of interest.

A high-quality evaluation team report plays an essential role in supporting an accrediting agency’s decision-making body in reaching well-founded accreditation decisions. The CNME has developed two documents it provides to evaluation team members to support them in writing a quality report. The first is a publication titled “Handbook for Onsite Evaluators of Naturopathic Medicine Programs,” which outlines the role and responsibilities of evaluators. Paragraph 5 on page 9 of the handbook states: “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.” [see Exhibit C16 – Handbook for Onsite Evaluators – 2019 edition]. Appendix B of this document, titled “Characteristics of a Well-Written Evaluation Team Report,” provides detailed guidance in writing a quality team report. This publication also provides guidance to team members on preparing for and conducting the evaluation visit; if visitors are well-prepared and conduct themselves effectively, they are in a better position to produce a quality report. The other CNME publication provided to team members to support them in writing the team report is the “Evaluation Team Report Template” [see Exhibit C17]. This document provides (i) instructions on how to draft the team report so as to ensure that it is sufficiently detailed and comprehensive, and fully addresses a program’s compliance with respect to each of CNME’s 11 accreditation standards, and (ii) a report template that includes all of the required report sections. The template document helps to ensure that all required content is included. Inevitably, with different team members responsible for drafting different sections of the team report, there can be some stylistic and formatting inconsistencies, as well as variation in the

level of detail provided. The CNME executive director works in partnership with the team chair to make sure that the final version of evaluation team report is complete, clearly written, and includes sufficient detail on all aspects of the program under review; when necessary, they may request a team member to revise their section or add more detail.

### **Linked Exhibit Files**

**Exhibit Title**

Exhibit C16 Handbook for Onsite Evaluators 2019 edition  
Exhibit C17 Evaluation Team Report Template

**File Name**

Exhibit C16 Handbook for Onsite Evaluators 2019 edition.docx  
Exhibit C17 Evaluation Team Report Template.docx

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**Criteria:**

**602.17(g) Student Verification**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.18(a) Standards Respect Mission, Ensure Quality & Are Clearly Written**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.18(b) Consistent Application of Standards**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.18(c) Decisions Based on Published Standards**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.18(d) Reasonable Assurance of Accurate Information**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.18(e) Report Clearly Identifies Deficiencies**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.19(a) Reevaluation**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.19(b) Monitoring**

#### **Response:**

The primary way CNME seeks to ensure effective ongoing monitoring of programs between comprehensive candidacy and accreditation visits is by requiring candidate and accredited programs to submit an annual report, which is due by January 15 [see Exhibit C11 – CNME 2019 Annual Report Form for ND Programs]. As can be seen from the form, each program provides information annually on a number of key indicators, such as enrollment, NPLEX exam results (i.e., the national licensing exam) and attrition rates; a program is also required to report on significant changes in areas such as enrollment, curriculum, and physical resources; additionally, each program provides information and documentation on the measures it has taken to address any outstanding recommendations (i.e., non-compliances) identified by the Council, as stated either in the most recent candidacy or accreditation decision, or subsequently decided by the Council between comprehensive visits; this portion of the annual report plays an important role in the enforcement of standards. As part of the annual report, each program also includes the most recent audited financial statement for the institution, a copy of the program's catalog or calendar, and a Financial Metrics Worksheet that provides information on the financial stability of the institution [see Exhibit C12 – Financial Metrics Worksheet]; the audit and financial metrics documents are useful for spotting potential financial challenges that may be developing.

Each member of the CNME Board has access to copies of all of the programs' annual reports in advance of the regular spring Board meeting (usually held in May), at which the reports are reviewed. To ensure that annual reports are carefully reviewed, individual CNME board members are assigned specific responsibilities as follows: (i) for each annual report, two Board members are assigned to be a review team, with one board member assigned to provide both in writing and orally the review team's conclusions/findings (e.g., issues that may pertain to compliance with standards), and (ii) two members are assigned to review the financial information presented by each program. Also, the executive director reviews each report, and may alert review teams to areas that might raise compliance issues or require a more in-depth review. To provide direction to Board members in performing these various review tasks and to ensure completeness and consistency in the annual report reviews from year to year, we have developed review guides that Board members follow [see Exhibit C18 – Annual Report Review Guide, and Exhibit C19 – CNME Guidelines for Reviewers of Financial Statements]. Additionally, annual report review teams are responsible for evaluating whether programs have made progress in addressing—or have satisfactorily addressed—any outstanding recommendations areas; the annual report review process is central to the CNME's process of enforcing the standards, as described in more detail in a subsequent section. To guide reviewers in evaluating a program's progress in addressing outstanding recommendations, reviewers are provided with another form with specific information on any outstanding recommendations [see Exhibit C20 – 2019 Annual Report Review Form]. Since determining whether a program has satisfactorily addressed a compliance issue is of great importance to both the CNME and the program, the review team may request the program to

provide additional documentation/evidence on the steps the program has taken to address the issue prior to the Council meeting.

Most annual reports do not present issues that would require action on the part of the Council due to a compliance issue not previously identified. If, however, it appears there might a compliance issue, the primary reader would present a summary of his/her findings to the full Board and, if appropriate under the circumstances, would recommend further action. Additionally, any other Board member or the executive director may bring potential issues to the attention of the Board. In recent years, the only thing that has triggered Board action between comprehensive visits has been an institution's financial issues.

Because CNME candidate (i.e., preaccredited) ND programs are newer and therefore may be somewhat less stable than more mature programs, the CNME requires a candidate program to submit two years into its 5-year candidacy period a progress report that contains detailed information on the program, including its efforts to address areas of weakness; following submission of the progress report, CNME conducts an onsite evaluation visit to the program to make sure that the program continues to be in substantial compliance with CNME standards, is satisfactorily addressing any findings from the initial candidacy visit, and is making satisfactory progress towards initial accreditation [see Exhibit B11 – Handbook of Accreditation, paragraph #4 on page 21, under “Terms of Agreement for Candidate Programs”].

When granting or reaffirming candidacy or accreditation, CNME may request a program to submit an interim/focused report within a certain period of time, typically within one, two or three years. An interim/focused report informs CNME of a program's progress in meeting the recommendations contained in the most recent CNME decision letter to the program, or is focused on particular areas that the Council considers problematic. The Council reserves the right to conduct other monitoring activities or special evaluations of programs—including requiring submission of a report on a particular issue or conducting a site visit not previously scheduled—whenever circumstances may indicate that this is necessary [see Exhibit B11 – Handbook of Accreditation, page 25, “Focused and Interim Reports and Visits”].

### Staff Analysis:

The agency has a clear set of protocols for monitoring the continued compliance of accreditation standards for ND programs.

The primary method of ensuring continued compliance and overall stability of the program is through the annual reports programs are required to submit. The agency submitted an annual report form as one of its supporting documents for this criterion. Some key pieces of information programs must include in the form include enrollment, national licensing exam results, its most recent audited financial statements, and any component of the program that experienced significant changes over the calendar year. The report must also include how the program addressed outstanding “recommendations” or “areas of improvement” from the site team's written report.

While the agency has submitted an annual report form, a completed annual report and documentation of acceptance or approval of the annual report must be submitted to demonstrate implementation of this monitoring approach.

Furthermore, at the agency's annual Board meeting in May, Board members will review the strength and stability of the program and raise areas of concern if more arise. If there are outstanding recommendations, Board members review additional information regarding the criterion that is not in compliance. The Board also reserves the right to request a focused report from the program during any time of the year if the Board finds any criterion problematic.

At the May 2020 Board meeting, the Department observed that the agency was following the stated protocols in monitoring the ND programs via its annual report process.

### Resubmission Response:

Please see the following exhibits: Exhibit D16 - SCNM 2018 Annual Report; and Exhibit D17 - CNME letter to SCNM re 2018 annual report. Exhibit D16 is an example of a completed annual report, namely that of an accredited ND program offered by the Southwest College of Naturopathic Medicine (SCNM). Exhibit 17 is an example of a letter from the CNME to an accredited program (SCNM) regarding the CNME board's review of the program's annual report.

## Linked Exhibit Files

| Exhibit Title   | File Name  |
|---|--|
| Exhibit C18 Annual Report Review Guide                            | Exhibit C18 Annual Report Review Guide.docx                            |
| Exhibit C19 CNME Guidelines for Reviewers of Financial Statements | Exhibit C19 CNME Guidelines for Reviewers of Financial Statements.docx |
| Exhibit C20 2019 Annual Report Review Form                        | Exhibit C20 2019 Annual Report Review Form.docx                        |
| Exhibit D16 - SCNM 2018 Annual Report                             | Exhibit D16 - SCNM 2018 Annual Report.pdf                              |
| Exhibit D17 - CNME letter to SCNM re 2018 annual report           | Exhibit D17 - CNME letter to SCNM re 2018 annual report.docx           |

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### Criteria:

#### 602.19(c) Annual Headcount

### Response:

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued

recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.19(d) Significant Growth**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.19(e) Distance/Correspondence Headcount Increase**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that we believe would bring our agency into noncompliance with any of the requirements of this section of the recognition criteria. Note that all CNME-accredited ND programs are primarily residential; however, some of the programs offer a modest amount of coursework utilizing an online and/or blended format (i.e., includes both online and in-person components). As described elsewhere in this petition, CNME has standards and policies pertaining to the use of online delivery. If CNME's allowance for online and/or blended coursework constitutes a change in scope, then CNME may be out of compliance with the §602.27(a)(5) notification requirement. Note also that CNME tracks via the required annual report (described elsewhere in this petition) substantial increases and decreases in first-year enrollment (i.e., greater or less than 25%) and also tracks total enrollment. No CNME-accredited programs have ever experienced an increase in headcount enrollment of 50 percent or more; in fact, any increases have been substantially lower than that. However, CNME does not have a specific policy that tracks the §602.19(e) requirement; thus, if CNME's current allowance for some use of online/blended coursework by CNME-accredited programs constitutes a change in scope, the CNME should adopt a specific policy tracking the §602.19(e) requirement.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.20(a) Enforcement Timelines**

#### **Response:**

CNME's Policy 18 ("Enforcement of Standards")—see Exhibit B11, page 98—was developed to ensure the Council's compliance with §602.20 of the ED recognition criteria. This policy basically tracks the language of this criterion with some additional provisions. Since ND programs are four years in length, the policy allows a program that is out of compliance with a standard to take up to two years to come into compliance; the CNME also allows for an extension of up to one year for "good cause," provided that certain conditions are met.

The CNME has not in recent years encountered any situation that has necessitated immediately initiating adverse action against the institution or program. Generally, the CNME provides programs two years to address a non-compliance. As noted earlier in this petition, CNME has several mechanisms in place to support the ongoing enforcement of standards: (i) programs are required to submit an annual report using a CNME report template; this report includes information and documentation regarding the program's efforts to address outstanding recommendations (i.e., non-compliances); (ii) the CNME may require a program to submit a focused report on its efforts to address recommendations; and (iii) the CNME may conduct a focused evaluation visit to more readily determine whether outstanding recommendations have been satisfactorily addressed. In the unusual situation that the CNME had serious concerns about a program's compliance with a wide range of accreditation standards, it could move up the date for a comprehensive accreditation review; however, this has never been necessary.

### **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:****602.20(b) Enforcement Action****Response:**

As noted above, CNME's Policy 18 ("Enforcement of Standards")—see Exhibit B11, page 98—was developed to ensure the Council's compliance with §602.20. Section #2 of this policy states "If the program does not bring itself into compliance within the time period specified by the Council, the Council shall either: (a) Take immediate adverse action; or (b) Extend for "good cause" the period of time provided for achieving compliance. To be eligible for an extension for "good cause," the program must comply with the four conditions for "good cause" listed in Section 3 below. Such extensions are granted only for limited periods of time, as specified in Section 4 below." Section #3 sets forth the requirements for CNME to extend the time period for achieving compliance, and Section #4 sets forth the requirements for an extension of an additional year beyond the two years generally provided to ND programs to come into compliance. It has been our experience that certain types of deficiencies, notably those related to financial stability, sometimes take more than two years to fully remediate; in these cases, CNME will extend the time period for addressing the deficiency beyond two years if there is evidence of reasonable progress.

It should be noted that CNME has three sanctions of progressive severity: "Letter of Advisement," "Probation" and "Show Cause"; these are described in the Handbook of Accreditation in the section titled "Sanctions" (see pages 25 – 26). If a program does not remedy an outstanding compliance issue within an extended time period (i.e., three years), the Enforcement of Standards policy requires that the Council initiate a Show Cause sanction. In practice, the CNME has rarely had to resort to formal sanctions in order to enforce our standards and policies. The one type of sanction issued in recent years has been the Letter of Advisement [see Exhibit C21 – CNME 2016 Letter of Advisement to CCNM]. In our experience, programs generally make good-faith efforts to address deficiencies and are able to remediate deficiencies in a timely manner.

**Staff Analysis:**

This criterion requires that an agency either initiate immediate adverse action or allow an institution a time period to come into compliance with its standards and requirements, with an option for an extension for good cause

It is not clear that the agency appropriately implements the requirements of this regulation, as the agency appears to implement "Show Cause" even after the institution has been given guidance and time to amend the non-compliant areas. Within its "Enforcement of Standards" policy, #5 states that after providing a time period to return to compliance and after a good cause extension of such time period, the agency would place the program on "Show Cause." However, according to the Department's definition, a "Show Cause" is not an adverse action which is the required action by this section. By placing a program on "Show Cause," the agency does not meet the Department's requirement for initiating adverse action. The agency stated that it has not had an opportunity to implement this policy and therefore, cannot provide documentation of implementation.

**Resubmission Response:**

In order to address the finding under this section, the CNME board of directors will, at its upcoming annual meeting (scheduled for November 7-8, 2020), review and consider for adoption a proposed revision to the Policy on Enforcement of Standards: see Exhibit D18 - CNME Policy on Enforcement of Standards - revised draft1 (proposed revisions are tracked). Section 5 of this policy has been revised to read as follows: "In the event that a program fails to remedy a noncompliance issue within the original or extended time period specified by the Council, the Council shall immediately initiate an adverse action, namely a denial, withdrawal, suspension, revocation, or termination of accreditation or candidacy status, or any comparable accrediting action". We believe that this revised language meets the requirements under this section.

### Linked Exhibit Files

**Exhibit Title**

Exhibit C21 CNME 2016 Letter of Advisement to CCNM  
Exhibit D18 - CNME Policy on Enforcement of Standards - revised draft1

**File Name**

Exhibit C21 CNME 2016 Letter of Advisement to CCNM.docx  
Exhibit D18 - CNME Policy on Enforcement of Standards - revised draft1.docx

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**Criteria:****602.21(a)(b) Systematic Review of Standards****Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### Linked Exhibit Files

There are no linked exhibit files.

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**Criteria:**

**602.21(c) Revision of Standards**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(a)(1) Approval of Substantive Changes**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(a)(2)(i-vii) Types of Substantive Change**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(a)(2)(viii) Approving Additional Locations**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(a)(2)(ix-x) Other Locations Needing Approval**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(a)(3) When New Evaluation Required**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(b) Substantive Change Procedures**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(c) Fiscal and Administrative Capacity Determination**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(c)(1) Approval of Additional Locations**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(c)(2) Approval Procedures for 3+ Locations**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.22(c)(3) Approval Procedures for Rapid Growth**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued

recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

#### **602.22(d) Purpose of Visits**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

#### **602.23(a) Public Information**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

#### **602.23(b) Opportunity for 3rd-party Comments**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

#### **602.23(c) Complaint Procedures**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

#### **602.23(d) Public Disclosure of Accreditation Status**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.23(e) Public Correction of Inaccurate Information**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.23(f) Proviso for additional procedures**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(a) Branch Campus**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(b) Change in Ownership**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(c)(1) Teach-out Plan Triggers**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(c)(2) Treatment of Students**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(c)(3) Notifying Other Agencies**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(c)(4) Requiring Teach-out Agreements**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(c)(5) Approving Teach-out Agreements**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(d) Closed Institution**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(e) Transfer of Credit Policies**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(f)(2) Credit Hour Review**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(f)(3) Actions of Deficiencies**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.24(f)(4) Credit Hour Notifications**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.25(a-e) Basic Due Process Requirements**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.25(f) Specific Appeals Requirements**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.25(g) Basis for Appeal Outcome Provided**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.25(h) New Financial Information**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.26(a) Notifications: Positive Decisions**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.26(b) Notifications: Negative Decisions**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

### **Linked Exhibit Files**

There are no linked exhibit files.

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#### **Criteria:**

##### **602.26(c) Notice to Public w/in 24 hours**

#### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

## **Linked Exhibit Files**

There are no linked exhibit files.

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### **Criteria:**

#### **602.26(d) Brief Summary w/in 60 Days**

### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

## **Linked Exhibit Files**

There are no linked exhibit files.

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### **Criteria:**

#### **602.26(e) Notifications: Voluntary Withdrawal**

### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

## **Linked Exhibit Files**

There are no linked exhibit files.

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### **Criteria:**

#### **602.27(a)(1-5) Other Information to be Provided**

### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

## **Linked Exhibit Files**

There are no linked exhibit files.

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### **Criteria:**

#### **602.27(a)(6-7),(b) Fraud and Abuse**

### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

## **Linked Exhibit Files**

There are no linked exhibit files.

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### **Criteria:**

#### **602.28(a) Regard for the Legal Authorization of an Institution**

### **Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

## **Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.28(b) Regard for Negative Actions by Other Accreditors**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.28(c) Explanation of Over-riding Decision**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.28(d) Requirement to Initiate Review**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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**Criteria:**

**602.28(e) Information-Sharing with Other Accrediting/Approval Bodies**

**Response:**

There have been no changes to our agency's standards, policies and procedures since our last ED/NACIQI review for continued recognition that could bring our agency into noncompliance with any of the requirements of this section of the recognition criteria.

**Linked Exhibit Files**

There are no linked exhibit files.

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