

Step 1 - Contact Information

Identifier: CNME
Name: Council on Naturopathic Medical Education
Meeting Date: 12/2015

Address

P.O. Box 178
Great Barrington, MA 01230

Accrediting Agency Administrator

Title: Executive Director
Name: Dr. Daniel D Seitz
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Point of Contact (POC) for the Content of the Submission

Name: Dr. Daniel D Seitz
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Step 2

Type of Submission: Renewal Petition **This is the current scope of recognition for your agency which was granted by the Secretary of Education:**

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

Criteria: 602.10 Link to Federal programs

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.11 Geographic scope of accrediting activities.

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.13 Acceptance of the agency by others.

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.14(a) Category of Agency

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.15(a)(1) Staffing/Financial Resources

Response:

ADEQUATE ADMINISTRATIVE STAFF. CNME is managed by an executive director, Daniel Seitz, MAT, JD, EdD, who is currently employed as a full-time employee under a three-year contract. He has been with CNME for eleven years. Dr. Seitz is very well qualified for his position, both in terms of education and professional experience. Including his tenure at CNME, Dr. Seitz has 23 years of senior administrative/leadership experience in higher education, accreditation and non-profit management, primarily related to complementary and alternative medicine; additionally, he has experience in state government administration and regulatory law, and also in private law practice. 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 (a USDE-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 developed 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 A-1, "Daniel Seitz resume," and Exhibit A-2: "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 worked for the CNME for 10 years [see Exhibit A-3, "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 technical needs such as computing and information systems, and to provide expert advice on legal matters and other areas. Given the small size of the agency, the level of executive and support staffing is fully adequate for the workload.

ADEQUATE FINANCIAL RESOURCES. CNME's primary revenue source is annual fees from accredited and candidate ND programs; these fees currently account for nearly all of CNME's revenues and are sufficient to fully support the agency. The remaining revenue is derived from: onsite evaluation fees, which exactly cover the costs of site visit expenses; intermittent application fees from new programs seeking accreditation; unsolicited donations (CNME is a tax-exempt, 501(c)(3) organization); and interest on our reserves. The expenses of conducting on-site evaluation visits are billed to the programs on a cost-recovery basis. Because these expenses are fully offset by reimbursements from programs, any increase in the number of visits that CNME conducts, if new programs are recognized, will not affect CNME's overall financial situation.

Currently, CNME’s annual revenues and expenses are in the neighborhood \$220,000 to \$235,000 [see Exhibit A-4, "FY 2013 & 2014 finance reports, FY 2015 finance report as of 04-30-15"]. Generally, we experience modest annual increases in expenses due to inflation, and the CNME Board of Directors raises annual fees as necessary to reflect anticipated expenses for the coming fiscal year. Due to having had steady fiscal year-end surpluses for many years now, CNME’s financial reserves are currently equal to about one full year of operating expenses (i.e., around \$235,000); we believe that this level of reserves provides strong financial stability and security to the agency. It should be noted that every year an outside CPA either reviews or audits CNME’s finances (we alternate reviews and audits), and our audits are consistently “clean,” meaning that there are no major concerns regarding our internal financial policies and procedures [see Exhibit A-5, "FY 2012 & 2013 CPA-audited and reviewed statements"]. Also, one of CNME’s Board members is a CPA and serves as CNME’s treasurer. We believe that having a CPA serving as a CNME board member and treasurer, biennial financial audits, and an experienced contract bookkeeper together ensure that the CNME has in place careful oversight mechanisms to protect the agency’s finances.

Exhibit(s) Linked to this Criterion

Exhibit Title	File Name
Exhibit A-1 - Daniel Seitz resume	Exhibit A-1 - Daniel Seitz resume.doc
Exhibit A-2 - Daniel Seitz Employment Contract	Exhibit A-2 - Daniel Seitz Employment Contract.doc
Exhibit A-3 - Jean Jenkauskas resume	Exhibit A-3 - Jean Jenkauskas resume.doc
Exhibit A-4 - FY 2013 & 2014 finance reports, FY 2015 finance report as of 04-30-15	Exhibit A-4 - FY 2013 & 2014 finance reports, FY 2015 finance report as of 04-30-15.xls
Exhibit A-5 - FY 2012 & 2013 CPA-audited and reviewed statements	Exhibit A-5 - FY 2012 & 2013 CPA-audited and reviewed statements.pdf

Criteria: 602.15(a)(2) Competency of Representatives

Response:

QUALIFICATIONS OF BOARD MEMBERS. CNME is a programmatic accrediting agency for doctoral-level naturopathic medical programs leading to either the ND (Naturopathic Doctor) degree or the equivalent NMD (Naturopathic Medical Doctor) degree, or—in the case of one Canadian program—an ND diploma. The CNME Board of Directors (also referred to as the “Council”) is both the agency’s policy-making and decision-making body. The composition of the Board is generally set forth in the CNME’s Articles of Incorporation and Bylaws, and more specifically in CNME Policy 1: “Council Membership” [see Exhibit B-1, “CNME Handbook of Accreditation, 2014 edition,” pp. 82, 97, and 102]. Board members fall into 3 categories: “Institutional Member Representatives” (i.e., senior academic administrators and faculty members from accredited programs), “Profession Members” (i.e., licensed naturopathic practitioners; this can include NDs who serve as senior academic administrators and faculty members), and “Public Members” (i.e., individuals who have no connection with naturopathic medicine or CNME-affiliated ND programs); see Exhibit B-2 (“CNME Board Directory May 2015”) for current board member terms and affiliations.

As can be seen from Exhibit B-3 (“CNME Board Member CVs”), CNME continues to attract highly qualified and experienced individuals to serve on the Board. Public members are usually drawn from higher education, and either have significant experience in accreditation or bring knowledge of a specialized area of importance to CNME’s work, such as finances. Currently, all three of our public members have extensive senior-level administrative and accreditation experience in higher education; two of them have a PhD degree and one is an MBA/CPA. Currently, all of our institutional member representatives have an ND degree and are senior academic administrators; two also have other relevant degrees—e.g., master’s degrees in education, nursing and acupuncture—and two have a teaching role. Currently, our profession members include experienced practitioners with other relevant professional experience, faculty members and one senior academic administrator. Term lengths (three years) and term limits (one term for institutional member representatives, two terms for profession and public members) are set forth in the CNME Bylaws and in Policy 1. Term limits help to ensure that decision-making authority is not vested in a few individuals over excessively long periods of time; at the same time, terms are staggered to ensure a reasonable level of continuity and to maintain institutional memory.

BOARD MEMBER TRAINING. CNME requires new Board members to participate in training activities before they attend their first CNME Board meeting as an appointed member in order to become oriented to their roles and responsibilities [see Exhibit B-1, Policy 1, pp. 82-83]. This is accomplished in several ways: (i) by inviting prospective Board members to attend a regular Board meeting before they are voted on; (ii) by including prospective Board members in an evaluator training workshop, or inviting them to accompany an evaluation team on a visit, and (iii) by having the executive director provide an orientation session for new members to give them information pertinent to the work of the Council prior to attending their first regular meeting [see Exhibit B-4, “Email regarding board member orientation”].

QUALIFICATIONS OF ON-SITE EVALUATORS. For its onsite evaluations, CNME selects site team members ("evaluators") from a pool of individuals (currently comprising 38 individuals) that includes former and current senior higher education administrators, faculty members in naturopathic medical programs and related fields, and practicing naturopathic physicians [see Exhibit B-5, "CNME Evaluator Pool 2015," and Exhibit B-6, "CNME Evaluator CVs"]. Every person in the evaluator pool is required to participate in a CNME evaluator training workshop, which is designed to inform them of CNME's accreditation standards and policies and how to apply them. Over the years, CNME has conducted several half-day and all-day evaluator training workshops, most recently in 2010, in Portland, Oregon [see Exhibit B-7: "2010 evaluator training schedule," which includes the workshop agenda and an outline of the presentations]. We are planning on holding the next workshop in 2016, after the Council completes a comprehensive revision of its accreditation standards. Workshops are conducted by individuals with significant higher education and accreditation experience, as well as individuals with expertise related to naturopathic medical education.

All of the current members of the CNME Board of Directors attend regularly scheduled evaluator training workshops, regardless whether or not they were trained previously. Current evaluators who attended previous evaluator training workshops are not required by CNME to participate in subsequent workshops, although we invite these individuals to join us if they are in attendance at a CNME meeting or otherwise available to participate (the workshop planned for 2016 will, however, be mandatory for all evaluators in the current pool, since it will cover revisions to the standards since the last workshop in 2010). As the need arises, we also invite well qualified people to attend 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 on occasion also invites individuals through professional publications and other communications to contact CNME if they are interested in becoming evaluators. Each evaluation team is, in general, composed of individuals who have expertise in higher education/academic administration, naturopathic instruction (including faculty), and naturopathic medical practice.

DISTANCE EDUCATION. Currently, CNME is in the process of revising its accreditation standards and policies to allow CNME-recognized ND programs to use hybrid/blended course delivery approaches in the context ND training. While this will not fundamentally alter the primarily residential quality of ND training, it will require CNME to provide some focused training to board members and onsite evaluators on how to evaluate programs that use hybrid/blended and related e-learning approaches; this will happen in the context of the next evaluator training session, which is planned for 2016. Already, on a few occasions, board members have made presentations to the Board regarding distance/online educational technology and its implications for CNME's accreditation process [see Exhibit B-8, "COSPP meeting agenda, 10-04-2013," agenda item #5].

Exhibit(s) Linked to this Criterion

Exhibit Title	File Name
Exhibit B-1 - CNME Handbook of Accreditation, 2014 edition	Exhibit B-1 - CNME Handbook of Accreditation, 2014 edition.pdf

Exhibit B-2 - CNME Board Directory May 2015

Exhibit B-3 - CNME Board Member CVs

Exhibit B-4 - Email regarding board member orientation

Exhibit B-5 - CNME Evaluator Pool 2015

Exhibit B-6 - CNME Evaluator CVs

Exhibit B-7 - 2010 evaluator training schedule

Exhibit B-8 - COSPP meeting agenda, 10-04-2013

Exhibit B-2 - CNME Board Directory May 2015.docx

Exhibit B-3 - CNME Board Member CVs.docx

Exhibit B-4 - Email regarding board member orientation.pdf

Exhibit B-5 - CNME Evaluator Pool 2015.docx

Exhibit B-6 - CNME Evaluator CVs.docx

Exhibit B-7 - 2010 evaluator training schedule.doc

Exhibit B-8 - COSPP meeting agenda, 10-04-2013.doc

Criteria: 602.15(a)(4) Educator/Practitioner Representatives

Response:

As noted earlier, CNME is a programmatic accrediting agency for naturopathic medicine doctoral programs. One of the U.S. programs affiliated with CNME is offered in a single-purpose institution, as are both of the Canadian programs; the remaining five programs are offered by multipurpose institutions. The Council’s Board of Directors is the agency’s policy-making and decision-making body. In compliance with §602.15 (a)(4), CNME’s Articles of Incorporation, Bylaws and policies require educators and practitioners to serve on the Board. Under CNME Policy 1 (“Council Membership”), the following paragraphs indicate CNME’s specific requirements for educators and practitioners [see Exhibit B-1, HOA, pp. 82-83]: “Profession members of the Council hold a current license to practice naturopathic medicine in a United States or Canadian jurisdiction that regulates the practice of naturopathic medicine. They are active members of a national, state or provincial association of naturopathic physicians, and they either currently serve as faculty members in a CNME-accredited or candidate program or have experience as educators, or are knowledgeable about accreditation. The Council shall have a minimum of four and a maximum of six profession members” (see second bulleted paragraph). “CNME must ensure that the Board of Directors includes significant representation of individuals whose major professional activities include teaching, including one individual who whose primary activity is teaching” (see sixth paragraph). Presently, there are six Board members who fall into our “profession member” category. The primary professional activity of one profession member—Steven Rissman, ND—is teaching; he is a full-time faculty member at Metropolitan State University of Denver. Marianne Marchese, ND, another profession member, is an adjunct faculty member at Southwest College of Naturopathic Medicine. Three of the current profession members—Drs. Kruzell, Longenecker and Woolard—are practicing naturopathic physicians; each of them also has had significant academic experience in higher education. And one profession member—Dr. Carino—is an academic administrator. Two of our current institutional member representatives—Drs. Henriksen and Staruch—are academic administrators who also teach in their ND program. [See Exhibit B-3, “CNME Board Member CVs,” for information on the credentials of our individual Board members].

As noted in our response under §602.15(a)(2) above, the Council has a pool of 38 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 B-6, “CNME Evaluator CVs”). It is CNME’s practice to routinely include educators and practitioners on the evaluation teams that visit ND programs as part of the comprehensive on-site evaluation process for initial candidacy, initial accreditation and reaffirmation of accreditation—as well as on teams conducting focused visits [see Exhibit B-9, “CNME Evaluation Team Report Coversheet,” which shows the professional composition of an evaluation team].

Exhibit(s) Linked to this Criterion

Exhibit Title

File Name

Criteria: 602.15(a)(5) Public Representatives

Response:

The CNME Board, the agency’s decision-making body, consists 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. Consistent with the Articles of Incorporation, the CNME Board adopted a policy that requires that the CNME Board to appoint two or three members who are representatives of the public [see Policy 1 (“Council Membership”), published in Exhibit B-1, HOA, on pp. 82-83]. The third bulleted paragraph of Policy 1 states: “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”); 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. Public members bring expertise in educational administration, academics or accreditation to the Council. The Council may have a minimum of two and a maximum of three public members.” Presently, three of the board’s twelve members—G. Lansing Blackshaw, PhD; John Pecchia, MBA, CPA; and Carl Saubert, PhD—are public members, none of whom are affiliated with a naturopathic medicine program [see Exhibit B-3, "CNME Board Member CVs," for more information on CNME’s three public members].

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

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 is set forth in paragraph (c) (“Conflict of Interest”) in the seventh article of the Articles of Incorporation [see Exhibit B-1, HOA, page 100]; this policy is primarily designed to control against financial conflicts of interest in the approval of contracts and other transactions of the Board of Directors, and also to prevent self-dealing. No issue of financial conflict of interest has arisen during the 11-year tenure of the current executive director, who was responsible for writing this re-recognition petition.

CNME has also adopted a policy titled “Potential Conflicts of Interest” [see Exhibit B-1, HOA, Policy 2, pp. 83-84] that pertains “Council members [i.e., CNME board members], evaluation team members, consultants, staff and other Council representatives” who have a conflict of interest (or the appearance of a conflict of interest) due to being “affiliated with” a naturopathic medicine program. Under the policy, a person is considered to be “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 Potential Conflicts of Interest policy 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.

Among other things, the Potential Conflicts of Interest policy requires Board members to recuse themselves from voting on recognition decisions or other actions related to ND programs if they have or may have an actual or apparent conflict of interest due to a current or prior affiliation with a CNME accredited or candidate program. Prior to discussions and votes on recognition actions and any other matters pertaining to CNME-accredited or candidate ND programs or programs seeking candidacy, the CNME president or executive director 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. This policy is observed in practice, as evidenced by the minutes of a CNME Board meeting [see Exhibit B-10, “Board meeting minutes May 4 & 5, 2013,” pp. 7-10, under the heading “Business related to recognition actions (closed session)”].

As noted above, the policy on Potential Conflicts of Interest also explicitly applies to evaluation

team members. We also note on p. 15 of the Handbook of Accreditation, in the third paragraph under the heading “Function and Composition,” that the chief administrative officer of an ND program “is asked to inform the Council’s executive director of any potential issues regarding the team’s composition,” including a potential conflict of interest. [See Exhibit B-11, “email re draft NCNM self-study report; evaluation team members,” highlighted paragraph, for an example of a program being given an opportunity to identify whether any potential conflicts of interest exist in regard to the members of an evaluation team.]

Exhibit(s) Linked to this Criterion

Exhibit Title	File Name
Exhibit B-10 - Board meeting minutes May 4 & 5, 2013	Exhibit B-10 - Board meeting minutes May 4 & 5, 2013.doc
Exhibit B-11 - email re draft NCNM self-study report; evaluation team members	Exhibit B-11 - email re draft NCNM self-study report; evaluation team members.docx

Criteria: 602.15(b) Recordkeeping

Response:

The Council’s Policy 10 (“Confidentiality and Retention of Council Records”) [see Exhibit B-1, HOA, page 92] addresses the requirements for record maintenance under this this criterion. In particular, the last two paragraphs of that policy read as follows:

“For each program’s last two comprehensive reviews, the Council maintains the following records: (1) the program’s self-study reports, (2) the Council’s on-site evaluation reports, and (3) the program’s responses to the evaluation reports. The Council also maintains the following records on each program dating back to the Council’s second-to-last comprehensive review (1) all of the annual reports submitted by the program, (2) any interim reports, progress reports, and substantive change reports submitted by the program, (3) any interim or focused evaluation team reports and the program’s responses, and (4) any reports or materials generated as a result of a special review.”

“The Council also maintains throughout a program’s affiliation with the Council the following records: (1) all decisions regarding accreditation and candidacy, including correspondence that is significantly related to those decisions; (2) decisions and correspondence related to substantive changes; and (3) a complete and accurate chronological record of all its decisions regarding candidacy and accreditation of a program.”

The way the CNME observes this policy is by (i) storing hardcopies of the documents we are required to keep for each program (e.g., evaluation team reports and correspondence related to accreditation decisions) either in file cabinets located in the CNME office or on office shelves, (ii) maintaining electronic versions on these documents on the CNME office computer, (iii) maintaining back-ups of documents on an external hard drive, and (iv) using Carbonite, an online document back-up service, that automatically backs-up electronic documents on the CNME office computer.

In order to track documents and maintain a complete history of the ND programs affiliated with the CNME, the CNME creates and regularly updates for each program an “Institutional Member Record” that (i) lists the documents on file for the program, and (ii) lists chronologically all recognition decisions. The CNME administrative assistant is responsible for maintaining CNME documents and records in accordance with the policy on Confidentiality and Retention of Council Records, and for updating Institutional Member Records [see Exhibit B-12, “SCNM Institutional Member Record,” for an example of an Institutional Member Record].

Exhibit(s) Linked to this Criterion

Exhibit Title	File Name
Exhibit B-12 - SCNM Institutional Member Record	Exhibit B-12 - SCNM Institutional Member Record.docx

Criteria: 602.16(a)(1)(i) Student Achievement

Response:

CNME has one set of accreditation standards that covers both candidacy (i.e., preaccreditation) and accreditation. In developing CNME's current accreditation standards, the Council had two mutually reinforcing goals: to promote high quality naturopathic medical education and to make sure that the standards fully address USDE's recognition criteria. Several of CNME's evaluative criteria in its current standards address a program's success with respect to student achievement in relation to the program's mission. Accreditation Standard I, "Mission and Objectives," requires under Section A, Paragraphs 1 and 3, that "a naturopathic medicine educational and clinical training program ... has a clear, concise and realistic mission statement that identifies what it intends to accomplish, and encompasses the educational preparation of naturopathic physicians/doctors" and that "the mission must be accompanied by a set of programmatic objectives that address instruction, research/scholarship and service. The objectives must be consistent with the mission and guide the program in establishing specific learning outcomes for students in the program." Standard I, Section E, Paragraph 2, further requires that "the re-evaluation process [of the mission and objectives] takes into account the results of the program's assessment and outcomes review processes." [See Exhibit B-1, HOA, pp. 34-35.] Standard VII, "Evaluation and Assessment," states in the preamble that "The program must have in place thorough processes for (i) evaluating each student's academic and clinical performance and achievement in relation to the program's mission and educational requirements, (ii) evaluating the professional success of its graduates, and (iii) assessing overall program outcomes and effectiveness in relation to the program's mission and programmatic objectives." These sections demonstrate that CNME broadly requires that programs evaluate the academic and professional success of their students and graduates in relation to the programmatic mission and objectives. Standard VII, Section B, goes on to specify in greater detail CNME's expectations regarding a program's assessment of student success and achievement: "As part of its assessment processes, the program gathers and maintains a sufficient variety and amount of data—including various outcomes measures—on students and graduates to enable the program to (i) document student achievement of individual clinical competencies and comprehension of subject matter, and (ii) evaluate and document the overall effectiveness of its training and the accomplishment of the program's stated mission and programmatic objectives." In Standard VII, Sections E, F and G, specific outcomes measures are listed as either required (e.g., results on the national licensing exam, "NPLEX," and program completion rates) or suggested (e.g., percentage of graduates who gain state/provincial licensure). [See Exhibit B-1, HOA, pp. 47-49.] Part Five of the HOA ("Self-Study Guide for Candidacy and Accreditation") describes in detail the documentation that programs must provide to demonstrate that they meet the requirements set forth in the accreditation standards [see Exhibit B-1, HOA, pp. 53-81].

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

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

Response:

At the heart of the CNME accreditation standards is Standard VI, “Program of Study,” which specifies in detail CNME’s curriculum requirements for accredited and candidate doctoral programs in naturopathic medicine (“ND”/“NMD” programs) [see Exhibit B-1, HOA, pp. 42-47]. Standard VI is divided into four sections: Section A (“Program Development, Delivery and Integration”), which sets forth general requirements for the program such as length, instructional methods, assignment of credits, and the integration of didactic and clinical components; Section B (“Academic Component”), which sets forth in detail the courses/subject matter that must be covered in the program and related competencies that must be attained; Section C (“Clinical Education Component”), which sets forth in detail CNME’s requirements regarding clinical training (e.g., minimum number of patient treatments, range of conditions seen) and clinical competencies (e.g., developing a thorough knowledge and the necessary skills of charting practices and patient record maintenance); and Section D (“Clinic Administration, Resources, and Facilities”), which sets forth further requirements on how the clinical training component of programs is organized to ensure a high quality clinical experience for student-interns. It should be noted that CNME has developed its accreditation standards in close consultation with accredited and candidate ND programs, national naturopathic practitioner associations in the US and Canada, and other national, US state and Canadian provincial organizations in the field of naturopathic medicine. We believe that this consultative approach to developing our standards helps to ensure that CNME is genuinely a reliable authority regarding the quality of naturopathic medical education and training.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

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

Response:

Standard IV, “Program Faculty,” is the CNME accreditation standard that sets forth CNME’s requirements for faculty [see Exhibit B-1, HOA, pp. 38-39]. Standard IV is divided into the following six sections: Section A, “Faculty Qualifications,” which covers faculty educational credentials, clinical experience, and instructional skills; Section B, “Faculty Sufficiency,” which covers sufficiency of program faculty to meet instructional needs and fulfill academic responsibilities; Section C, “Faculty Orientation and Performance Evaluation,” which covers orientation of new program faculty and periodic performance evaluation of all program faculty; Section D, “Faculty Professional Development,” which covers on-going professional development of program faculty to enhance effectiveness and address deficiencies; Section E, “Faculty Participation in Program Development and Academic Administration,” which covers the role of program faculty in regard to academic responsibilities apart from instruction, such as curriculum development; and Section F, “Conditions of Faculty Employment,” which outlines the range of employment/human resources policies pertaining to program faculty that the program must have in place.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

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

Response:

CNME’s requirements regarding facilities, equipment, and supplies are primarily contained in Standard XI, “Physical Resources” [see Exhibit B-1, HOA, page 52]. Section A of this standard broadly requires that “the program [be allocated] sufficient physical resources—including instructional, library, clinical, office and research facilities, equipment and supplies—to achieve its mission and objectives.” Among the specific areas covered in the standard are: the sufficiency of faculty and staff offices, conference areas and other physical resources for the purposes of teaching, research, administration and other functions; safety, accessibility and maintenance of the facilities; sufficiency of equipment and supplies to meet the needs of staff, faculty and students; and protection of records. Additionally, Standard IX, “Library and Learning Resources,” contains several requirements regarding library facilities and equipment [see Exhibit B-1, HOA, pp. 49-51].

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.16(a)(1)(v) Fiscal/Administrative Capacity

Response:

FISCAL CAPACITY. Standard III, “Financial Resources,” is the CNME accreditation standard that addresses a program’s fiscal capacity to operate effectively [see Exhibit B-1, HOA, pp. 36-37]. Among other things, the standard requires that “the financial resources of the program must adequately provide for instruction, research and scholarship, administration, learning resources, student services and activities, maintenance, equipment, supplies, and other specific needs and functions that are consistent with the program’s mission and objectives,” that the “institution in which the program is located must be financially sound, and have resources sufficient to carry out the program’s mission and educational objectives [in the] current, short and long term,” and that the institution must “have the financial capacity to respond to financial exigencies and unanticipated occurrences.” Additionally, Standard III specifies CNME’s requirements regarding financial management and planning.

ADMINISTRATIVE CAPACITY. Standard II, “Organization, Governance and Administration,” is the main standard that sets forth CNME’s requirements in regard to a program’s administrative capacity [see Exhibit B-1, HOA, pp. 35-36]. The three key paragraphs that address administrative capacity are the following:

- Paragraph B1: “The program is located in an institution that has an appropriately qualified chief executive officer (e.g., president) whose full-time or major responsibility is to the institution.”
- Paragraph B2: “The program must have an appropriately qualified chief academic officer (e.g., dean)—or an appropriate academic leadership team—whose full-time or major responsibility is to the program. The chief academic officer or the academic leadership team must have appropriate authority and autonomy to manage the program and must ensure that (i) fiscally responsible strategic or long-range planning is periodically carried out in order to enable the program to adapt to changing circumstances, and (ii) the program of study is regularly reviewed and revised as needed.”
- Paragraph B3: “The program must have an appropriately qualified and stable administrative staff sufficient in size to meet the needs of the program and achieve the program’s mission. The organizational structure of the administrative staff should be clearly set forth in an organizational chart or some other document. Staff members should have clearly defined roles and responsibilities, and have sufficient authority to carry out their responsibilities effectively.”

Administrative capacity is also addressed in the following accreditation standards: Standard III (“Financial Resources”), which requires that the institution have a qualified chief financial officer; Standard V (“Student Services”), which requires financial aid personnel to have ongoing professional training; and Standard IX (“Library and Learning Resources”), which requires that library staff be qualified and that overall library staffing be sufficient.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion



Criteria: 602.16(a)(1)(vi) Student Support Services

Response:

Standard V (“Student Services”) sets forth CNME requirements regarding student support services [see Exhibit B-1, HOA, pp. 39-42]. Paragraph A1 states generally that “the program shall provide student services and activities that reflect the program’s mission and objectives, support good student morale, and assist students in the achievement of personal and professional growth while they progress through the program. Student services shall include, at a minimum, well-developed programs in the following areas: (i) admissions, (ii) orientation, (iii) advisement and counseling, (iv) financial aid (if offered), (v) tutorial services, and (vi) career development services.” Several sections of Standard V cover specific student services in greater detail: Section B (“Admissions”), addresses student services in the area of admissions and recruitment; Section C (“Student Records”) addresses student services pertaining to accessing records; Section D (“Financial Aid”) addresses student services pertaining to the administration of federal student aid; and Section E (“Counseling”) addresses student services in regard to academic, career and personal counseling.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.16(a)(1)(vii) Recruiting & Other Practices

Response:

Recruiting and admissions practices—and to some extent advertising practices—are covered in Standard V, “Student Services,” under Section B (“Admissions”) [see Exhibit B-1, HOA, pp. 39-42]. Section B has nine paragraphs that cover various aspects of admissions and recruitment. For example, Paragraph B1 contains the following requirements concerning admissions practices: “The program shall have a published student admission policy that (i) reflects the program’s mission and objectives, 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”; and Paragraph 6 requires that “recruitment and admissions activities shall be conducted legally, and with honesty and integrity. The content of marketing materials and of any representations made to prospective students must be clear and accurate.”

Academic calendars, catalogs, publications, grading, and advertising are covered under in Standard V, “Student Services,” under Section F (“Official Publications and Online Resources”), which reads as follows:

1. The program shall make available to students and to the general public a catalog, calendar, student handbook or comparable official publication (or publications) that accurately sets forth its:
 - a. Current mission and programmatic objectives
 - b. Admissions requirements and procedures
 - c. Transfer credit and advanced standing policies, including the criteria for accepting transfer credit
 - d. Tuition, fees and refund policies
 - e. Opportunities and requirements for financial aid (if applicable)
 - f. Academic performance requirements
 - g. Policies and procedures related to satisfactory academic progress
 - h. Rules for student conduct
 - i. Student disciplinary procedures
 - j. Student grievance procedures
 - k. Grading and attendance policies
 - l. Program completion requirements
 - m. Members of the administration, including their positions
 - n. Professional education and qualifications of full- and part-time faculty
 - o. Members of the governing board
 - p. Non-discrimination policy
 - q. Academic calendar
 - r. Program sequence or outline
 - s. Description of each academic program, including the curriculum and course descriptions for each course
 - t. Description of the learning and other physical resources

- u. Sources of information on the legal requirements for licensure and entry into the profession
- 2. 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.
- 3. The program must publish its status and relationship with the Council and provide the Council's address and phone number in accordance with CNME policy.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.16(a)(1)(viii) Program Length

Response:

MEASURES OF PROGRAM LENGTH. CNME specifies the overall length for ND programs in Standard VI, “Program of Study,” Paragraph A2 as follows: “A naturopathic medicine program consists of a minimum of four academic years. It is a residential program, typically presented in a quarter, trimester or semester format. Including clinical education, a naturopathic medicine program requires a minimum of 4,100 clock hours. Assignment of credits to individual courses is consistent with accepted practices in higher education”. Additionally, CNME specifies the minimum length of the clinical training portion under Paragraph C5 of Standard VI as follows: “The program’s clinical education component provides at least 1,200 clock hours of clinical training involving patient contact in a clinical setting” [see Exhibit B-1, HOA, pp. 42, 46]

OBJECTIVES OF DEGREES/CREDENTIALS OFFERED. CNME considers the ultimate objective of any CNME-recognized ND program to graduate competent practitioners of naturopathic medicine. For example, Paragraph A1 of Standard VI (“Program of Study”) sets forth the following requirement [see Exhibit B-1, HOA, page 42]: “The program of study, including the academic and clinical components, is ‘competency based.’ A naturopathic medicine program clearly articulates—both for individual courses and for the program in its entirety—the core competencies and educational objectives, consistent with its mission, that it considers necessary for a student to graduate as a competent doctor of naturopathic medicine.” The broad objective of graduating competent doctors of naturopathic medicine is broken down into a number of smaller, discrete competencies that characterize a competent naturopathic practitioner. These include such things as: “becoming clinically competent, caring and ethical primary care/general practice physicians/doctors, with a well-developed sense of personal wellness, knowledge of their unique skills as healers, and full understanding of their scope of practice and its strengths and limitations”; developing “skills in patient lifestyle counseling in preventive approaches, including health education/promotion, disease prevention and mind-body medicine”; and developing the “ability to evaluate and apply knowledge and information obtained from a variety of sources, including scientific and professional literature, clinical experience, and traditional naturopathic practices” [see Exhibit B-1, HOA, page 44]:

Another key objective of CNME-accredited ND/NMD programs is to ensure that graduates are eligible for licensure in those US states and Canadian provinces where naturopathic medicine is a licensed profession. Generally speaking, eligibility for licensure is based on two factors: (i) completion of a CNME-accredited or candidate ND/NMD program, and (ii) passing the NPLEX exam, which is used as the licensing exam in the US and Canada. CNME Standard VI (“Program of Study Standard”) sets forth the curriculum content that a program must cover to prepare students to pass the NPLEX exam, and CNME Standard VII (“Evaluation and Assessment”) enables CNME to monitor the NPLEX pass rates of graduates of accredited and candidate programs to make sure that the programs are, in fact, adequately preparing graduates to pass the NPLEX.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion



Criteria: 602.16(a)(1)(ix) Student Complaints

Response:

CNME Policy 6 (“Maintaining a Record of Student Complaints”) sets forth CNME’s requirements regarding recording student complaints, as follows [see Exhibit B-1, HOA, page 89]:

“In accordance with the Council’s Accreditation Standard V (Student Services), accredited and candidate programs are required to publish policies and procedures for addressing student complaints and grievances, and to review and respond in a timely manner to student complaints submitted in accordance with the published policies and procedures.

“In accordance with the Council’s Accreditation Standard V (Student Services), accredited and candidate programs are required to maintain a complete record of formal student complaints and grievances, dating back at least three years or to the time of the Council’s last comprehensive evaluation visit, whichever is longer, and to make the record available to the Council’s evaluators during any on-site evaluation visit or at such other times as the Council may request. The record includes the complaints filed and a description of the actions taken to resolve them.

“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.”

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.16(a)(2) Preaccreditation Standards

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.16(b)(c) Distance/Correspondence Education

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.17(a) Mission & Objectives

Response:

MAINTAINS CLEARLY SPECIFIED EDUCATIONAL OBJECTIVES. Under CNME Standard I (“Mission and Objectives”), a program is required to have a “clear, concise and realistic mission statement that identifies what it intends to accomplish, and encompasses the educational preparation of naturopathic physicians/doctors.” This standard further requires that the mission statement be “consistent with the operating authority of the program and institution, and reflect doctoral level education.” Standard I also requires that the “mission must be accompanied by a set of programmatic objectives that address instruction, research/scholarship and service. The objectives must be consistent with the mission and guide the program in establishing specific learning outcomes for students in the program.” [See Exhibit B-1, HOA, page 34.] Under Standard VI (“Program of Study”), Paragraph A1 states: “The program of study, including the academic and clinical components, is ‘competency based.’ A naturopathic medicine program clearly articulates—both for individual courses and for the program in its entirety—the core competencies and educational objectives, consistent with its mission, that it considers necessary for a student to graduate as a competent doctor of naturopathic medicine” [see HOA, page 42].

IS SUCCESSFUL IN ACHIEVING ITS STATED OBJECTIVES. There are several ways that the CNME evaluates whether a program is in compliance with the above CNME requirements—i.e., whether the program “maintains clearly specified educational objectives that are consistent with its mission and appropriate in light of the degrees or certificates awarded.” (Note that in the case of the CNME, the programs we accredit are all at the doctoral level; all the programs in the U.S. award a doctoral degree, “ND” or “NMD,” while one of the two programs in Canada issues a doctoral-level diploma and the other issues a doctoral-level degree using different nomenclature.) First, any program seeking CNME candidacy status or initial accreditation, or reaffirmation of accreditation, must submit a comprehensive self-study report that (i) describes in narrative form the degree to which the program meets each of the 11 CNME accreditation standards and provides an appraisal of how the program might improve in regard to each standard, and (ii) provides documentary evidence in appendices to substantiate and elaborate upon the information provided in the narrative. [See Exhibit C-1, “Bastyr U. 2013 Self-Study Report,” pp. 10-15, 66-104.] Second, a CNME evaluation team reviews the self-study report, conducts an onsite visit to verify the contents of the report and evaluate the program’s compliance with CNME accreditation standards and policies, and issues an evaluation team report that contains the team’s finding regarding the program’s compliance. [See: Exhibit C-2, “Evaluator Worksheets, 2011 edition” which CNME evaluators use in order to ensure that they fully evaluate a program’s compliance with each accreditation standard; and Exhibit C-3, “Bastyr Evaluation Team Report 2013” pp. 6, 16-21.] Third, the CNME conducts a hearing for reaffirmation of accreditation during which the CNME board of directors (the Council’s decision-making body) can ask questions of the program and the program can provide further information on the program’s compliance with CNME’s accreditation standards and policies. Finally, the CNME issues a decision letter that presents the Council’s findings regarding compliance. [See Exhibit C-4, “Bastyr Decision Letter 2013.”]

MAINTAINS REQUIREMENTS THAT CONFORM TO COMMONLY ACCEPTED STANDARDS. As noted earlier, CNME Standard VI (“Program of Study”) requires that “a naturopathic medicine program consists of a minimum of four academic years. It is a residential program, typically presented in a quarter, trimester or semester format. Including clinical education, a naturopathic medicine program requires a minimum of 4,100 clock hours. Assignment of credits to individual courses is consistent with accepted practices in higher education.” [See Exhibit B-1, HOA, pp. 42-43]; this program length and duration is consistent with doctoral level medical education in other fields, including conventional medicine and chiropractic. Furthermore, CNME’s curriculum requirements for the ND/NMD degree conform to commonly accepted standards, as evidenced by: (i) their endorsement by CNME-affiliated programs; (ii) their acceptance by US licensing authorities (currently naturopathic medicine is licensed in 18 states; licensure generally requires graduation from a CNME candidate of accredited program); (iii) their acceptance by USDE-recognized regional accrediting agencies that accredit the six U.S. institutions that offer CNME-recognized ND programs (note that under CNME Standard II “a program in the U.S. that has CNME candidacy status is eligible for initial accreditation by CNME only if it located in an institution that has candidacy or accreditation status with an institutional accrediting agency recognized by the U.S. Dept. of Education”—see HOA, page 35); (iv) their acceptance by the state higher education agencies—located in WA, OR, AZ, IL, CT and Puerto Rico—that authorize CNME-recognized programs to grant the ND degree (note that under CNME Standard II a program “must have authorization to offer a Doctor of Naturopathic Medicine degree or designation from the appropriate state or provincial agency”—see HOA, page 35); and (v) their acceptance by the North American Board of Naturopathic Examiners.

Exhibit(s) Linked to this Criterion

Exhibit Title	File Name
Exhibit C-1 - Bastyr U. 2013 Self-Study Report	Exhibit C-1 - Bastyr U. 2013 Self-Study Report.pdf
Exhibit C-2 - CNME evaluator worksheets, 2011 edition	Exhibit C-2 - CNME evaluator worksheets, 2011 edition.doc
Exhibit C-3 - Bastyr Evaluation Team Report 2013	Exhibit C-3 - Bastyr Evaluation Team Report 2013.docx
Exhibit C-4 - Bastyr Decision Letter 2013	Exhibit C-4 - Bastyr Decision Letter 2013.docx

Criteria: 602.17(b) Self-Study

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.17(c) On-Site Review

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.17(d) Response to Site Review

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.17(e) Agency Analysis of Information

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

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 [see Exhibit C-3, “Bastyr Evaluation Team Report 2013,” as an example]. The content of the report is described as follows in Exhibit B-1, HOA, on pp. 16-17, under the heading “Evaluation Team Report”: “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 overall performance with respect to student achievement.” Additionally, the CNME provides evaluation team members with a publication entitled “Handbook for On-Site 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 eligibility requirements, standards; and policies; and (iii) whether the program’s performance with respect to student achievement is satisfactory” [see Exhibit C-5, “Handbook for On-Site Evaluators of Naturopathic Medical Programs”].

When drafting the evaluation team report, team members refer to a CNME publication titled Evaluation Team Report Template, which contains (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, (ii) a report template that includes all of the required report sections [see Exhibit C-6, “Evaluation Team Report Template”]. The template document ensures that no required content is inadvertently left out. Finally, the CNME executive director works in partnership with the team chair to make sure that the content of the final version of evaluation team report is complete, clearly written, and includes sufficient detail on all aspects of the program under review.

Exhibit(s) Linked to this Criterion

Exhibit Title	File Name
Exhibit C-5 - Handbook for On-Site Evaluators of Naturopathic Medical Programs	Exhibit C-5 - Handbook for On-Site Evaluators of Naturopathic Medical Programs.doc
Exhibit C-6 - Evaluation Team Report Template	Exhibit C-6 - Evaluation Team Report Template.doc

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

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.18(b) Consistent Application of Standards

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.18(c) Decisions Based on Published Standards

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.18(d) Reasonable Assurance of Accurate Information

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.18(e) Report Clearly Identifies Deficiencies

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.19(a) Reevaluation

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.19(b) Monitoring

Response:

Throughout the accreditation review cycle, the Council monitors programs to ensure continuing compliance with CNME's accreditation standards. As described earlier, the CNME requires programs seeking CNME candidacy status, initial accreditation, and reaffirmation of accreditation to submit a comprehensive self-study report to the CNME. A CNME evaluation team then reviews the self-study report, conducts an onsite visit to verify the contents of the report and assess the program's compliance with CNME accreditation standards and policies, and issues an evaluation team report that contains the team's finding regarding the program's compliance. [See Exhibit C-3, "Bastyr Evaluation Team Report 2013."] Finally, the CNME conducts a hearing for reaffirmation of accreditation and issues a decision letter that presents the Council's findings (i.e., "recommendations") regarding compliance. [See Exhibit C-4, "Bastyr Decision Letter 2013."] Both the evaluation team report and the Council's decision letter identify problems with a program's initial or continued compliance with agency standards, and both documents provide details regarding an institution's and/or program's strengths and stability.

To ensure effective ongoing monitoring between comprehensive candidacy and accreditation visits, CNME requires candidate and accredited programs to submit an annual report, which is due by January 15 [see Exhibit B-1, HOA, p. 27, "Annual Reports"]. CNME has developed an annual report form—updated annually—that programs are required to use [see Exhibit D-1, "CNME Annual Report Form for 2014"]. As can be seen from the form, each program provides information annually on a number of key indicators, such as NPLEX exam results and attrition rates, and informs CNME of significant changes in areas such as enrollment, finances, faculty, curriculum, and physical resources; additionally, each program provides information on the measures it has taken to address any recommendations identified by the Council, as stated in the most recent candidacy or accreditation decision. Along with 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 D-2, "Financial Metrics Worksheet_2014Template"]. Each member of the CNME Board receives copies of all of the programs' annual reports in advance of the regular spring Board meeting (usually held in April or May) at which the reports are discussed, and is expected to review each report. [For an example of a completed annual report, see Exhibit D-3, "SCNM 2014 Annual Report."]

To ensure that annual reports are carefully reviewed, individual CNME board members are assigned specific responsibilities for reviewing reports as follows: (i) For each annual report, one board member is assigned to be a primary reviewer and a second board member is assigned to be a secondary reviewer, and (ii) two members are assigned to review the financial information presented by each program. Also, the executive director reviews each report. 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 D-4, "annual report review guide," and Exhibit D-5, "financial statement

analysis guide”]. Additionally, annual report reviewers are responsible for evaluating whether programs have made progress in addressing and resolving any outstanding areas of noncompliance with CNME standards (i.e., “recommendations”); to guide reviewers in evaluating a program’s progress in addressing outstanding recommendations, reviewers are provided with another form [see Exhibit D-6, "SCNM Annual Report Outstanding Recommendations Form_2013"]. 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.

As part of CNME’s ongoing monitoring of a candidate (i.e., preaccredited) program, a candidate program is required to submit every two years a progress report that contains detailed information on the program; following submission of the progress report, CNME conducts an on-site evaluation visit to the program to make sure that the program continues to be in compliance with CNME standards and is making satisfactory progress towards initial accreditation [see Exhibit B-1, HOA, pp. 20-21, “Terms of Agreement for Candidate Programs”].

When granting or reaffirming accreditation or preaccreditation, CNME may request a program to submit an interim report within a certain period of time, typically within one, two or three years. An interim 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 D-7, “CNME 2014 letter to CCNM re requiring focused report,” and Exhibit D-8, “CCNM 2014 Focused Report”].

Exhibit(s) Linked to this Criterion

Exhibit Title	File Name
Exhibit D-1 - CNME Annual Report Form for 2014	Exhibit D-1 - CNME Annual Report Form for 2014.doc
Exhibit D-2 - Financial Metrics Worksheet_2014Template	Exhibit D-2 - Financial Metrics Worksheet_2014Template.xlsx
Exhibit D-3 - SCNM 2014 Annual Report	Exhibit D-3 - SCNM 2014 Annual Report.pdf
Exhibit D-4 - annual report review guide	Exhibit D-4 - annual report review guide.doc
Exhibit D-5 - financial analysis guide	Exhibit D-5 - financial analysis guide.doc
Exhibit D-6 - SCNM Annual Report Outstanding Recommendations Form_2013	Exhibit D-6 - SCNM Annual Report Outstanding Recommendations Form_2013.doc
Exhibit D-7 - CNME 2014 letter to CCNM re requiring focused report	Exhibit D-7 - CNME 2014 letter to CCNM re requiring focused report.doc
Exhibit D-8 - CCNM 2014 Focused Report	Exhibit D-8 - CCNM 2014 Focused Report.pdf



Criteria: 602.19(c) Annual Headcount

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.19(d) Significant Growth

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.19(e) Distance/Correspondence Headcount Increase

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.20(a) Enforcement Timelines

Response:

CNME's policies and procedures for taking adverse action when a review of a naturopathic medicine program indicates the program is not in compliance with one or more of CNME's eligibility requirements, accreditation standards or policies are stated in two places in the Handbook of Accreditation [Exhibit B-1]: for candidate (i.e., preaccredited) programs, see the section "Loss of Candidacy" on pages 21-22; and for accredited programs, see the section "Sanctions" on pages 25-26.

Candidate programs must be in full compliance with CNME's accreditation standards and policies, though the CNME makes some allowance for their stage of development, and CNME reserves the right to withdraw candidacy for failure to maintain compliance. Before withdrawing candidacy, the Council issues a "show-cause letter," which is a public sanction that states the reasons why and a specific date by when candidacy will be withdrawn unless the program can demonstrate that it is in compliance and its status should be continued. After receiving a response from the program, CNME may request a follow-up on-site visit, depending on whether the Council considers an on-site visit necessary to determine whether the program has corrected the deficiency. The CNME might consider initiating adverse action due to such things as an unfavorable on-site evaluation, information obtained from a self-study report or an annual report, or information provided by another regulatory agency. The policies allow the Council to initiate immediate adverse actions and to require programs to bring themselves into compliance with CNME's standards within a time period not to exceed two years (note that CNME-accredited ND programs are all four years in length or longer, and thus CNME has adopted two years as the maximum time limit).

For accredited programs, the process for taking adverse action against a program that is out of compliance with CNME standards is somewhat more involved. The following excerpt from the HOA outlines the process:

"The Council has the option, at any time, of applying a sanction to an accredited program in case of non-compliance with one or more of the eligibility requirements, standards or policies. By applying a sanction, the Council informs the program that it must bring itself into compliance within a certain specified timeframe. The following are the three sanctions the Council may apply; they are usually (though not always) applied sequentially, starting with a letter of advisement:

- Letter of Advisement. The naturopathic medicine program is formally advised by letter—sent to the program's chief administrative officer and copied to the institution's chief executive officer—of deficiencies or practices that could lead to a more serious sanction if not corrected expeditiously. The letter requests a focused report and (optionally) an evaluation visit by a specific date, generally not to exceed six months from the date of the letter (though the Council has discretion to specify a longer timeframe). The Council does not make public the fact that it has issued a letter of advisement.
- Probation. If a program fails to respond satisfactorily to a letter of advisement or continues to be non-compliant with eligibility requirements, accreditation standards or policies, it may be placed on probation, which is a public sanction. A formal letter is sent to the program's chief administrative

officer, with copies to the institution’s chief executive officer and the chair of the governing board, setting forth the deficiencies upon which the probation is based. The letter requests submission of a focused report and (optionally) an evaluation visit by a specific date, generally not to exceed six months from the date of the letter (though the Council has discretion to specify a longer timeframe).

- **Show Cause.** If a program fails to correct the deficiencies or practices that resulted in probation, does not respond to a letter of advisement, or is found otherwise to have strongly deviated from the Council’s eligibility requirements, standards or policies, it may be requested to show why its accreditation should not be withdrawn at the end of a stated period. The request to show cause is by formal letter to the program’s chief administrative officer, with copies to the institution’s chief executive officer and the chair of the governing board. The burden of proof is on the program to demonstrate to the Council why its accreditation should be continued beyond the stated period. The letter sets forth the deficiencies upon which the show-cause action is based, specifies the show-cause period, and requests submission of a focused report and (optionally) an evaluation visit by a specific date. The issuance of a show-cause letter is a public sanction.”

The section of the HOA on Sanctions also states that: “The Council may apply any sanction at any time, with the requirement that the program correct the cited deficiency or circumstance within a stated period, not to exceed two years from the imposition of the sanction, or not to exceed two years from the imposition of the first sanction if more than one sanction is applied for the same reason.”

It should be noted that CNME has rarely had to resort to formal sanctions in order to enforce our standards and policies. Generally, programs make good-faith efforts to address deficiencies, and are able to remediate deficiencies identified by the Council within two years (or a little longer where there is good cause to extend the deadline for remediation).

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.20(b) Enforcement Action

Response:

CNME’s procedures require it to take prompt adverse action—withdrawal of candidacy or accreditation—if the program does not bring itself into compliance within the specified period. This is indicated by the following policies: (1) “At the end of the time period stated in a show-cause letter, the Council will withdraw the accreditation of a program that has not corrected to the satisfaction of the Council the deficiencies or circumstances which led to the issuance of the letter” [see HOA, page 26, “Withdrawal of Accreditation”]; and (2) “The Council reserves the right to withdraw the candidacy of a program for cause, after due notice, if: (i) evidence of progress in development is lacking, (ii) if the conditions or circumstances upon which the program was granted candidacy have significantly altered so as to adversely affect the quality of the program, or (iii) the program fails to comply with the Terms of Agreement. If the Council believes that candidacy should be withdrawn, it issues a show-cause letter requesting that the program correct one or more identified deficiencies within a specified period of time, not to exceed two years” [see HOA, p. 21, “Loss of Candidacy”].

As noted in the previous section, CNME has rarely had to resort to formal sanctions in order to enforce our standards and policies. Generally, programs make good-faith efforts to address deficiencies, and are able to remediate deficiencies in a reasonable amount of time. Nothing in CNME’s policies prohibit the agency from extending the specified period stated in its original sanction for good cause. It has been our experience that certain types of deficiencies, such as 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.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

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

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.21(c) Revision of Standards

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.23(a) Public Information

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.23(b) Opportunity for 3rd-party Comments

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.23(c) Complaint Procedures

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.23(d) Public Disclosure of Accreditation Status

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.23(e) Public Correction of Inaccurate Information

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.23(f) Proviso for additional procedures

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.25(a-e) Basic Due Process Requirements

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.25(f) Specific Appeals Requirements

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.25(g) Basis for Appeal Outcome Provided

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.25(h) New Financial Information

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.26(a) Notifications: Positive Decisions

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.26(b) Notifications: Negative Decisions

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.26(c) Notice to Public w/in 24 hours

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.26(d) Brief Summary w/in 60 Days

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.26(e) Notifications: Voluntary Withdrawal

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.27(a)(1-5) Other Information to be Provided

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.27(a)(6-7),(b) Fraud and Abuse

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.28(b) Regard for Negative Actions by Other Accreditors

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.28(c) Explanation of Over-riding Decision

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: 602.28(d) Requirement to Initiate Review

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

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

Response:

There have been no changes to our agency's policies and practices since our last NACIQI review (of a petitioner and/or compliance report) that could bring our agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Exhibit(s) Linked to this Criterion

No Exhibits uploaded for this Criterion

Criteria: Requested Scope of Recognition

Response:

N/A.
