



## MEMORANDUM

TO: CNME-Accredited and Candidate ND Programs  
FROM: CNME Board of Directors  
RE: Extension of Temporary Policies to Address the COVID-19 Situation  
DATE: July 28, 2020

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### Introduction

In its memorandum to CNME-accredited and candidate ND programs dated April 1, 2020, the CNME Board of Directors provided guidance on temporary measures/flexibilities that ND programs were allowed to implement to address the external legal constraints impacting the delivery of naturopathic medical education due to the coronavirus situation, as well as the challenges and impediments this situation presented on a practical level. Since the coronavirus situation is continuing to impact higher education—and may do so through some or all of the 2020 – 2021 academic year—the CNME Board has decided to extend the temporary emergency policies set forth in its April 1, 2020 memo, as outlined and modified below. Based on authorization from the US Dept. of Education (USDE), CNME is extending these policies through December 31, 2020 (note that the CNME has provided programs an option for planning the entire 2020 – 2021 academic year utilizing the substantive change process—see below). The CNME Board has also added reporting requirements, as also outlined below. The intent of these temporary policies is two-fold: (i) to provide ND programs the temporary flexibilities they need to effectively deliver the curriculum in light of constraints due to the ongoing coronavirus situation, and (ii) to provide mechanisms by which the CNME can effectively monitor program quality and adherence to accreditation standards during this time.

Recognizing that the coronavirus situation is still evolving, the CNME Board will continue to review the situation taking into account any updated guidance from the USDE and will issue further temporary emergency policies, if necessary under the circumstances.

### Temporary Emergency Policies Pertaining to Clinical Training

The temporary emergency CNME policies regarding delivery of the *clinical* portion of an ND program outlined in the April 1, 2020 memo shall remain in effect through December 31, 2020, with the following provisions:

- The temporary emergency policies contained in the April 1, 2020 memo may be extended to students in all phases of the clinical training program. The CNME expects programs to provide as comprehensive and robust a clinical training experience as possible within the legal and practical constraints due to the ongoing coronavirus situation, and to strive to

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remedy any deficiencies in clinical training as circumstances and students' remaining time in the program allow.

- As soon as external legal constraints on offering in-person clinical instruction and clinical internship training both on campus and at affiliated training sites are reduced or lifted entirely, ND programs will be required restart their normal clinical training programs as quickly as practicable with the goal of fully restoring clinical training in accordance with CNME accreditation requirements by June 30, 2021.
- The CNME understands that restoring the in-person clinical training program will likely take some time due to a variety of factors, including the impact of shutting down clinics in the first place, patient concerns about in-person medical visits, and so on. Thus, the CNME expects a steady return to normal with a period during which clinical instruction will need to be delivered using a hybrid approach.
- Programs may, at their discretion, vary the scheduling of classes and the sequencing of material to facilitate the process of restoring in-person clinical training, and may postpone instruction to a later date where that may support more comprehensive training.
- The CNME notes that in the future it may revise its accreditation requirements regarding clinical instruction to accommodate the use of technologies, such as telemedicine, that allow for remote interactions with patients. However, the current accreditation requirements will continue in effect until revised.

### **Temporary Emergency Policies Pertaining to Didactic Coursework**

Through December 31, 2020, ND programs may continue to deliver some or all of their *didactic/academic* coursework via online/distance education. As noted in the April 1 memo, the CNME allows for use of distance/online delivery of education within the context of a primarily residential program (see the “Guidelines on the Use of Information & Communication Technology in Naturopathic Medical Education” on page 52 of the CNME *Handbook of Accreditation*); these guidelines must be observed.

The CNME understands the difficulties ND programs face in planning for the entire 2020 – 2021 academic year due to the uncertainties associated with the coronavirus situation. Should an ND program wish to utilize online/distance education delivery approaches through June 30, 2021, for most or all didactic/academic coursework in order for the institution and students to be able to effectively plan ahead, it must do the following:

- Submit a substantive change application to the CNME by September 30, 2020, at the latest (earlier is preferable) outlining its plans for delivering the curriculum for the first half of 2021, including information on curriculum adjustments/rearrangements and changes to assessment mechanisms that might be necessitated.
- Ensure that the overall 4-year ND program be primarily residential for all students, regardless of the year in which they enrolled, even if during the 2020 – 2021 academic year extensive use of distance/online education is utilized.

- Ensure that first-year students who enter the program in fall 2020 and begin their coursework entirely remotely have opportunities to develop a community of learning through on-campus activities, once such activities become possible (e.g., scheduling intensive sessions).
- Ensure that in-person practical training activities that might normally be scheduled during the first half of 2021 that the program wishes to postpone be rescheduled for a subsequent academic term with attention to effective sequencing and integration of material.

## **Reporting Requirements**

The U.S. Department of Education requires recognized accrediting agencies to engage in ongoing oversight of accredited programs. As stated in the April 1, 2020 memo, ND programs are required to submit by Friday, July 31, 2020, a report (maximum of five pages) summarizing in detail the modifications that the program implemented previously in response to the coronavirus situation and any plans for future modifications. The plans for future modifications should pertain to the fall 2020 semester (or equivalent term).

Additionally, the program must submit a report—to be included in the 2020 annual report to CNME—containing the following information:

- A summary of the temporary modifications the program made to curriculum content and delivery during the fall 2020 semester (or equivalent term).
- An evaluation of the impact that coronavirus-related program modifications have had on student learning outcomes, including any observed deficiencies that may have resulted.
- An outline of steps the program intends to take to address any educational deficiencies that may have resulted from program modifications.
- Student feedback solicited by the program on students' experience of their naturopathic education in light of the modifications.
- Specific coronavirus-related legal/regulatory requirements that the program believes will apply to the program during **2021**, with relevant documents provided as appendices.

If a program has any questions or comments about the above policies, please contact CNME Executive Director, Dr. Daniel Seitz, at 413-528-8877 or by email at [danseitz@verizon.net](mailto:danseitz@verizon.net).