

June 10, 2015

Dr. Nydia Bou, Dean, School of Health Sciences  
Dr. Milva Vega, ND, ND Program Director  
School of Health Sciences  
Universidad del Turabo  
P.O. Box 3030  
Gurabo, PR 00778

Dear Dr. Bou and Dr. Vega,

On behalf of the CNME Board of Directors, I would like to thank you for Universidad del Turabo's hospitality and cooperation during the February 2015 evaluation visit for candidacy of the Doctor of Naturopathic Medicine (ND) program, and for your attendance at the CNME candidacy hearing on May 31, 2015.

It is my pleasure to confirm in writing that the CNME Board voted to grant candidacy status to Universidad del Turabo's ND program. More specifically, the Council voted affirmatively on the following motion:

1. *To adopt the commendations, recommendations and areas of interest set forth in the CNME Evaluation Team Report of February 2015 with one change: the following area of interest in the Evaluation Team Report is now a recommendation:*  
***New Standard VI Recommendation:*** *Currently students have insufficient opportunities to perform certain clinical examinations (gynecological and digital rectal examinations) during their training. The NMDP should continue efforts to ensure that all students are adequately trained to competently perform these procedures. (Std. VI.C.2, VI.C.4b and c).*
2. *To grant candidacy to Universidad del Turabo's ND program.*

Attached as an addendum to this letter is a list of the commendations, recommendations and areas of interest adopted by the CNME Board of Directors, and enclosed are three hardcopies of the final version of the Evaluation Team Report. Please note that under U.S. Department of Education criteria, an ND program is required to address any outstanding CNME recommendations within a period of time not to exceed two years, unless the Council for good cause extends the period for achieving compliance. If you have any questions regarding the Board's decision, compliance with CNME standards and policies, or other matters, please do not hesitate to contact me.

As you are aware, candidate and accredited ND programs must observe the policies and procedures published in the *CNME Handbook of Accreditation*, including submission of an annual

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report that provides information on steps taken by the program to remedy outstanding recommendations and address areas of interest. Additionally, as a candidate program, the UT ND program must observe the following “Terms of Agreement” published in the *Handbook*:

■ **Terms of Agreement for Candidate Programs**

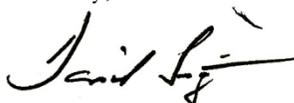
A naturopathic medicine program recognized by the Council as a candidate for accreditation agrees to comply with the following requirements:

1. Abide by the policies stated in the *Handbook of Accreditation* and any other policies the Council may adopt.
2. File an annual report to the Council by January 15 (annual report forms are provided to programs in the fall of each year).
3. Submit copies of a two-year progress report, as directed by the Council’s executive director, at least 60 days in advance of an evaluation visit for reaffirmation of candidacy (note that the *Handbook* contains information on what must be included in the progress report).
4. Host an evaluation visit for reaffirmation of candidacy every two years following the granting of initial candidacy, or earlier if requested by the Council.
5. Apply for initial accreditation only after consultation with the Council.
6. Pay annual dues and evaluation visit fees as established by the Council.

Candidate and accredited programs are expected to engage in a continuing self-study and self-development process to enhance quality. The Council may request a focused/interim report and an evaluation visit at any time, if circumstances so warrant—and is especially likely to do so if a program faces a serious problem or situation, and it appears that the program may not be able to continue to comply with the Council’s standards and policies or to fulfill its educational mission and objectives.

Congratulations on Universidad del Turabo achieving candidacy for its ND program.

Sincerely,



Daniel Seitz, JD, EdD  
Executive Director

cc. Dr. Elizabeth H. Sibolski, President, Middle States Commission on Higher Education,  
Mr. Ricardo Aponte Parsi, President, Council of Education of Puerto Rico

Enclosures

**FINDINGS OF THE U. DEL TURABO EVALUATION TEAM**  
**(From the February 2015 evaluation team report;**  
**adopted by the CNME Board of Directors on May 31, 2015**  
**with one area of interest changed to a recommendation)**

**LIST OF COMMENDATIONS**

**Commendation:** The Evaluation Team commends the administrative staff at the system, institutional, school and program levels for being committed, able, and responsive.

**Commendation:** The evaluation team witnessed a high degree of commitment on the part of the faculty to the program, students and naturopathic profession.

**Commendation:** The team commends UT on its provision of a wide range of student services and emphasis on student wellbeing, and the NMDP for the value it places on student input and responsiveness to student concerns. Students feel very supported by the capable, caring, and responsive student services staff.

**Commendation:** It is evident to the evaluation team that the university has a strong commitment to—and culture of—assessment.

**Commendation:** The Evaluation Team commends the program for the establishment of a capably led research and scholarship committee that has created and partially implemented a comprehensive plan the purpose of which is to develop the capacity of naturopathic faculty and students to conduct quality research and, more broadly, to create a culture of research.

**LIST OF RECOMMENDATIONS**

**Standard II-1**

**Concern and Recommendation:** The Evaluation Team is concerned that historically the teaching/clinical instruction loads of the NMDP Program Director and NMDP Clinical Coordinator have been too extensive to allow for adequate time for administrative duties. The Evaluation Team recommends that the NMDP limit the teaching/clinical instruction loads of the Program Director and Clinical Coordinator to a reasonable minimum so that they have adequate time for administrative duties. (Std.II.B.3)

**Standard IV-1**

**Concern and Recommendation:** The Evaluation Team is concerned that ND faculty members are not receiving regular formal performance evaluations. The Evaluation Team recommends that the NMDP expeditiously develop an evaluation schedule and process for conducting formal faculty evaluations, and that the evaluation process be implemented in a timely manner. (Std.IV.C.2)

**Standard VI-1**

**Concern and Recommendation:** The Evaluation Team is concerned that patient charts show a heavy use of acupuncture in the clinics at the expense of other of naturopathic treatment

modalities, thereby unduly limiting the clinical experience of students. The Evaluation Team recommends that the NMDP ensure that all student interns have opportunities to provide the full range of naturopathic treatment modalities in a balanced manner in the context of their clinical training. (Std.VI.C.2, VI.C.4b & c)

### **Standard VI-2**

**Area of interest:** Currently students have insufficient opportunities to perform certain clinical examinations (gynecological and digital rectal examinations) during their training. The NMDP should continue efforts to ensure that all students are adequately trained to competently perform these procedures. (Std.VI.C.2, VI.C.4b&c).

### **Standard VI-3**

**Concern and Recommendation:** Patient charts: (i) lacked evidence of pertinent physical examination findings, (ii) lacked differential diagnoses, and (iii) lacked incorporation of naturopathic principles in the clinical decision-making process. The Evaluation Team recommends that the NMDP ensure that patient interactions are complete and sufficiently documented. (Std.VI.4a, b, c & i)

## **LIST OF AREAS OF INTEREST**

### **Standard IV-1**

**Area of Interest:** It appears that financial resources are available for faculty development, including continuing education. However, faculty members seem unaware of these resources and how to apply for them. The program should inform faculty of the financial resources available for faculty development and how to apply for funding. (Std.IV.D.1)

### **Standard V-1**

**Area of interest:** From a review of the admissions files, the Evaluation Team observed that in the case of some students who were admitted with conditions, documentation demonstrating satisfaction of the conditions is lacking. The relevant department must verify that the outstanding conditions are met and that appropriate documentation is maintained in student files. (Std.V.B.5)

### **Standard VI-1**

**Area of Interest:** In some instances, two student interns share the primary role in providing treatments and are both granted credit for this; the program must make sure that credit for primary contacts reflects primary responsibility for the patient. (Std.VI.5d)

### **Standard VI-2**

**Area of Interest:** It appears that the way the program calculates clinical hours is inconsistent with the CNME clinical education requirements. (Std.VI.C.5a, b, d & e)

### **Standard X-1**

**Area of Interest:** The current research committee was developed through volunteer activity. The SHS should ensure the establishment of a permanent research structure that supports ND program faculty and students in developing research literacy and an understanding of methodology, and provides opportunities to engage in research. (Std.X.A.2)

**Standard XI-1**

**Area of Interest:** While the university is in the process of constructing a new facility to house the NMDP, the facilities currently allocated to the Program are not sufficient to provide for the effective functioning of the program and the needs of the students, staff, and faculty. (Std.XI.C)

**Standard XI-2**

**Area of Interest:** The University has projected enrollment increases for the NDMP, and should make sure that the space allocations for the program in the future are sufficient to accommodate the actual enrollment. (Std.XI.C)