



COUNCIL ON NATUROPATHIC MEDICAL EDUCATION

Evaluation Team Report

UNIVERSIDAD DEL TURABO

SCHOOL OF HEALTH SCIENCES

NATUROPATHIC MEDICINE DOCTORAL PROGRAM

Gurabo, Puerto Rico

Comprehensive Evaluation Visit for Initial Candidacy

February 9 – 11, 2015

*A Confidential Report to the Council
That Represents the Views of the Evaluation Team*

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**Universidad del Turabo
School of Health Sciences
Naturopathic Medicine Program**

Gurabo, Puerto Rico

February 9 – 11, 2015

EVALUATION TEAM MEMBERS:

Carl Saubert, PhD, Team Chair

Public Member, Council on Naturopathic Medical Education
St. Charles, Missouri

Jasmine Carino, ND

Associate Dean of Curriculum and Residency, Canadian College of Naturopathic Medicine
Profession Member, Council on Naturopathic Medical Education
Toronto, Ontario

Belinda Clarke, ND

Private Practitioner
Cobourg, Ontario

James Wallace, ND

Clinical Instructor and Chief Medical Officer, Bastyr Center for Natural Health, Bastyr
University
Seattle, Washington

CNME Staff

Daniel Seitz, JD, EdD

Executive Director, Council on Naturopathic Medical Education
Great Barrington, MA

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INTRODUCTION

Overview

The Sistema Universitario Ana G. Méndez (SUAGM) is the second largest private university system in Puerto Rico, enrolling 44,429 students in 2014. SUAGM is composed of four four-year, co-educational, private, not-for-profit institutions of higher education, including the Universidad del Turabo. In addition to these four institutions, SUAMG also maintains 15 additional locations throughout the island, two CBS-sponsored television stations, and five branch campuses on the United States mainland.

The Universidad del Turabo (UT) has an enrollment of about 15,000 students on its campus in Gurabo, Puerto Rico. UT also conducts operations at six additional locations in Puerto Rico and at the five mainland branch campuses. Academically UT is composed of nine main schools, including the School of Health Sciences (SHS), which was established in 1998.

The SHS offers accredited programs in speech-language pathology, nursing, and nutrition and dietetics. The SHS also offers the naturopathic medicine doctoral program (NMDP), which currently enrolls 46 students, or about 0.1% of the total enrollment of the SUAGM system. Within this context, the UT NMDP is markedly different from most other programs familiar to the CNME.

History

In 1941 Mrs. Ana Gonzalez de Méndez, together with Alfredo Muñiz Souffront and Florencia Pagán Cruz, founded the Puerto Rico High School of Commerce in Rio Piedras. In 1949 the institution changed its name and became Puerto Rico Junior College (PRJC). A total of 19 students were enrolled in this first Puerto Rican institution of higher education that offered two-year programs of study. In 1974 PRJC changed its name to the Ana G. Méndez Foundation, and in 1993 the system again changed its name, this time to the Sistema Universitario Ana G. Méndez.

In 1972 the PRJC branch campus in Gurabo was renamed Colegio Universitario del Turabo and began offering bachelor degree programs. In 1981 the Colegio Universitario del Turabo was renamed the Universidad del Turabo and began offering graduate level programs. In 2003 UT received permission to begin offering doctoral level programs.

UT began exploring the possibility of starting a Naturopathic Medicine Doctoral Program (NMDP) in 2005 to address the need of preparing health care providers with an integrative, holistic approach to clinical service delivery for the people of Puerto Rico. This need was identified through independent market research, by the paucity of practicing NDs on the island (7), and by the Health Resources and Service Administration (HRSA), which had designated approximately 45 municipalities in Puerto Rico as Health Professional Shortage Areas (HPSAs). UT began offering the NMDP through its SHS to a charter class of 10 students in September 2008.

Accreditation

In 1974 UT was recognized by what is now known as the Puerto Rico Higher Education Council and also was granted accredited status with the Middle States Commission on Higher Education. The University will be undergoing a regular comprehensive review for reaccreditation by the Middle States Association in the spring of 2015.

In 2011 UT submitted an Eligibility Application to the Council on Naturopathic Medical Education (CNME). The review committee of the CNME Board of Directors deferred action on the application pending receipt of additional information. UT submitted the requested additional information, and program representatives met with the CNME Board of Directors in May 2012. Following this meeting the CNME Board of Directors approved UT's Eligibility Application and authorized UT to prepare and submit a self-study report for initial candidacy with the CNME.

UT submitted a *Self-study Report* in May 2013. A review committee of the CNME Board of Directors identified a number of deficiencies in the *Self-study Report*, and UT was asked to submit a revised report that addressed the deficiencies identified by the review committee. A revised *Self-study Report* was submitted in April 2014. The review committee of the CNME Board of Directors found that the report still did not fully conform to the requirements established by the CNME. Nonetheless, the review committee authorized a candidacy evaluation visit to UT to review its NMDP, provided that UT submit a *Supplement to the Self-study Report* addressing the deficiencies in the report. UT submitted the requested supplement in December 2014.

Nature of Visit and Structure of the Report

On February 9-11, 2015, the CNME fielded an Evaluation Team to Puerto Rico to review the NMDP of the UT. During the course of the visit the Evaluation Team met with and interviewed the following individuals and groups:

- Members of the Board of Trustees (SUAGM)
- Vice-President for Human Resources (SUAGM)
- SUAGM Comptroller
- SUAGM Associate Vice-President for Financial Affairs
- SUAGM Recruitment Director
- UT Chancellor
- UT Vice Chancellor
- UT Vice Chancellor for Student Affairs
- UT Vice Chancellor for Physical Facilities
- UT Vice Chancellor for Information Resources
- UT Auxiliary Vice-President for Budget and Analysis
- UT Assistant Vice Chancellor for Institutional Assessment
- UT Financial Aid Director
- UT Informatics and Telecommunications Director
- SHS Dean
- SHS Associate Deans (2)
- SHS Director of Administration
- SHS Student Services Director

- SHS Academic Advisor
- NMDP Program Director
- NMDP Clinical Coordinator
- NMDP Research & Scholarship Committee President
- NMDP Basic Science Faculty
- NMDP Clinical Science Faculty
- NMDP Students (Years 1-2, Years 3-4, Clinic Interns)

In the Evaluation Team Report certain key words have special meanings. The word **commends** identifies an aspect of programmatic or institutional strength that the Site Team found worthy of special praise or of being highly noteworthy.

The term **is concerned** denotes an aspect of the program or institution that the Evaluation Team found to be deficient in meeting the criteria as stated in a particular element or section of the *CNME Accreditation Standards*. The word **recommends** represents the corrective action(s) the Evaluation Team deems necessary to remove the deficiency. Whenever a concern and associated recommendation appear in the report, the relevant CNME criteria are stated.

The term “**area of interest**” denotes a problematic situation that could potentially evolve to non-compliance with a CNME standard or policy; while not a formal finding like a recommendation, an area of interest is referenced in the *Evaluation Team Report* to a specific standard or policy.

The word ***suggests*** identifies a non-binding, collegial comment by the Evaluation Team intended for the purpose of programmatic or institutional improvement. The Evaluation Team hopes that the suggestions will be helpful to the program and institution. Evaluation Team suggestions do not, however, require any response or actions, and may be adopted, modified, or rejected freely.

A ***Determination*** is provided at the end of each Standards section of the report. This briefly describes the extent to which the Evaluation Team believes the program is in compliance with the particular Standard.

The Evaluation Team thanks the administrators, faculty, staff, and students of SUAGM, UT, SHS, and the NMDP for the hospitality, cooperation, and many courtesies shown throughout the visit. The friendliness and openness that was evident at meetings and interview sessions provided the Evaluation Team with useful and relevant information relative to UT’s application for initial candidacy status with the CNME and was very much appreciated.

STANDARD I: MISSION AND OBJECTIVES

A. Mission Statement and Programmatic Objectives

The NMDP mission and programmatic objectives address instruction, research and service, and align with the UT mission statement.

B. Development, Implementation and Re-Evaluation of the Mission Statement and Programmatic Objectives

The development of the NMDP mission and objectives began in 2006 when the Curriculum and Executive Committees of the SHS first drafted them. The UT Academic Board and Administrative Council subsequently approved the mission and objectives, and a proposal for establishing the NMDP program was then submitted to the Puerto Rico Education Council (PREC) and approved.

The following is the current NMDP mission:

The mission of the Naturopathic Medicine Program is to train naturopathic physicians who, through the application of critical thinking and clinical reasoning, excel in the understanding and practice of a patient-focused, evidence-based, interdisciplinary healthcare service model abiding by the philosophical principles which guide the art and science of naturopathic medicine.

In 2013 the program objectives were revised with direct input from a faculty member, the NMDP Clinic Coordinator, and the NMDP Program Director—and the SHS Dean subsequently approved them. The following are the current program objectives:

1. Provide a comprehensive education in Naturopathic and Oriental Medicine, through knowledge integration and application consistent with a holistic approach to medicine.
2. Advocate for professional and ethical standards applicable to local and global socio-political affairs regarding naturopathic professional integration in healthcare.
3. Utilize a service-model approach, which facilitates interdisciplinary collaboration, stressing the proper application of the scope of practice and its limitations, including appropriate referral criteria for integrated patient management.
4. Integrate throughout curriculum the necessary skills to promote a research oriented mindset in order to successfully critique existing research, their clinical application and the interest and proficiency in developing areas where research is needed.
5. Engage in individual student mentoring, prompting the development of excellent diagnostic and safe and effective therapeutic skills rooted in the philosophy and principles of naturopathic medicine.
6. Emphasize the importance of having a vast understanding of allopathic therapies and the use of critical thinking regarding safety and therapeutic interactions.
7. Promote the development of broad and in-depth evidence-based knowledge of health promotion, risk reduction and disease prevention.

Students confirmed they are aware of the mission and objectives. However, the faculty members who were asked about this were unaware of any recent revisions. The cycle of re-evaluation of the mission and objectives is five years. The Evaluation Team *suggests* that the program would benefit from greater stakeholder involvement in future reviews and revisions of the mission and program objectives.

The program objectives are published in the *Naturopathic Medicine Doctorate Student Handbook* that is available on the website and in the UT catalog. Since the wording of the

published program objectives is inconsistent with those included in the *Self-study Report*, the Evaluation Team **suggests** that the revised program objectives appear in appropriate publications in the next academic year.

The NMDP states that the program objectives are to guide the development of specific educational outcomes (identified as being part of the course syllabi template). However, direct curriculum mapping of course outcomes with these program objectives has not been undertaken to date, and the NMDP should be aware of this deficiency.

In its *Self-study Report* the NMDP identified a weakness in providing students with practice in a patient-focused, evidence-based, **interdisciplinary** (emphasis added) healthcare service model. The Evaluation Team observed that corrective action in being taken this area. The NMDP is actively looking for collaborations with other academic programs at the SHS, particularly with the opening of a new SHS building scheduled for January 2016, where a variety of health profession programs—including naturopathic medicine—will be housed. There is evidence of other interdisciplinary models being developed, specifically at the Pitirre Clinic in the Jose Enrique Arnau Hospital in Caguas, where the naturopathic students interact with patients in an outpatient clinic geared towards patients with addictions. At that clinic, naturopathic student interns can access the electronic medical records from the other health care providers to support care of patients. There are also individual faculty members from different professions—doctors of naturopathy (NDs), doctors of chiropractic (DCs), doctors of medicine (MDs)—who are mentoring the students in their preceptorships, and actively involving students in the assessment and management of patients. These preceptors have gained a naturopathic perspective on patient management.

Determination: Standard I on Mission and Objectives is being met.

STANDARD II: ORGANIZATION, GOVERNANCE AND ADMINISTRATION

Legal Organization

SUAGM is incorporated as a non-profit organization under the laws of the Commonwealth of Puerto Rico and has IRS 501(c)(3) status. UT is approved by the Puerto Rico Education Council (PREC) to offer educational programs, including the NMDP.

Governance

SUAGM is governed by a Board of Directors (Board) whose duties and powers are established by corporate bylaws. These responsibilities include safeguarding the assets and health of SUAGM; defining and establishing institutional policy; evaluating and approving the vision and mission; appointing the President of the Board; appointing senior executives in constituent institutions; approving budgets; and considering and approving long range plans.

The Board is composed of up to five permanent members, including the President and Executive Vice President of SUAGM, and up to eight elected members. The current Board is composed of 13 individuals with diverse educational and professional backgrounds. In addition to general powers and duties, the bylaws also specify matters such as the nomination, election, and terms of service for regular Board members; Board officers; frequency and conduct of Board meetings;

standing committees; and other such matters as are normally contained in the corporate bylaws of educational institutions/systems.

The bylaws also contain rules of ethics "...to assure impeccable functioning on the part of the Board of Directors" and a conflict-of-interest policy, and annually each Board member signs a conflict of interest statement identifying any business relationships that exist between the Board member and SUAGM. The corporation also reports this information annually on the IRS Form 990. As reflected in the signed conflict of interest statements and Form 990, at present more than one-third of the Board has a contractual employment and/or personal financial interest in SUAGM. These relationships are not in conflict with any legal requirements and have been reviewed and accepted by the Middle States Commission on Higher Education.

The Board conducts its major business through its five standing committees (Executive, Finance, Audit, Academic and Student Affairs, and Governance), who report activities, recommendations, and actions to the Board as a whole.

Despite its newness and small enrollment, the NMDP is known to, endorsed, and supported by the Board members who met with Evaluation Team members during the visit.

There are no other "governing boards" or equivalent within the system. The presidents/chancellors/rectors of the individual universities, including UT, manage their institutional affairs and report directly to the SUAGM president, who in turn reports to the SUAGM Board.

Administration

The current chancellor of UT has held this position for the past 22 years and is well qualified by education and experience for the responsibilities of office. It is through his support and advocacy that the NMDP has been able to reach its current state of development. A cadre of senior-level university administrators—who are also well qualified by education and experience to address their varied responsibilities—supports him.

Likewise, both the Dean of the SHS and the NMDP Program Director are appropriately qualified for their positions, and both have appropriate autonomy and authority to manage the daily operations of the SHS and the NMDP. These individuals are also involved in the planning and budgeting aspects of the school and program.

At the same time, 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. For this reason, 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)

NMDP faculty members report to the Program Director, and through this route participate in the development and implementation of programmatic matters.

There are multiple administrative support levels within SUAGM. Many areas and activities, such as finance, student services, academic records, human resources, etc., are centralized and

managed through the system's central offices. There are well-documented policies and procedures for each area of operation. This provides for the effective and efficient use of highly qualified personnel to the benefit of the entire system and uniformity of information and services to all system components.

Underneath the central system, individual institutions such as UT have similar administrative support elements, but those elements are responsible to the institution for the delivery of information and services to their employees and students, using the resources of the central system as appropriate to support their activities.

A similar pattern exists within the units of the institution, such as the SHS, which has administrative personnel in place to ensure proper point-of-contact delivery of information and services. These school personnel in turn work with their institutional peers as appropriate in the execution of their responsibilities. The Evaluation Team **commends** the administrative staff at the system, institutional, school and program levels for being committed, able, and responsive.

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)

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

Determination: Standard II on Organization and Administration is being met.

STANDARD III: FINANCIAL RESOURCES

Sufficiency of Resources

As indicated above, the UT NMDP is a very small part of a very large organization. The program's current and projected annual revenues and expenses each are less than \$1,000,000, while SUAMG's current annual revenues and expenses each hover around the \$280,000,000 mark.

SUAMG is financially sound and has an adequate financial base that is not overly leveraged with debt. The Evaluation Team was provided numerous examples by employees and students of instances where "needs" in the developing program were identified and sufficient resources were provided promptly to address those needs. In addition, the Evaluation Team was given assurances at every level that the resources necessary to support the continuing growth and maturation of the NMDP would be provided. A new facility to house the SHS and its programs—including the NMDP—is under construction and is scheduled to begin operations in January 2016, and there is palpable excitement within the SHS in anticipation of this opening. This facility is described more fully in Standard XI.

While the program is not now, and is not projected to be, a significant source of revenue, the value of the program and its graduates to the institution and to the people of Puerto Rico are deemed to be of sufficient worth to warrant continuing, appropriate support. In the several instances where the Evaluation Team identified a current direct or indirect deficiency in finances or other appropriate resources, assurances were given that the support would be forthcoming. The Evaluation Team **suggests** that this situation be monitored on a continuing basis.

The planning and budgeting processes of the program take into account current and projected enrollments, faculty and staffing needs, administrative and student support services, etc.

Financial Management

SUAMG meets all of the CNME criteria regarding the financial management of its operations.

Planning

As noted above, the Dean of the SHS and the NMDP Program Director are directly involved in the planning and budgeting aspects of the school and the program. Both the program multiyear strategic plan and multiyear budget projections are included in the December 2014 *Supplement to the Self-study Report*. The Evaluation Team **suggests** that the strategic plan be reviewed annually to ensure that needs or changes are identified or anticipated on an incremental basis, rather than every three to five years.

Determination: Standard III on Financial Resources is being met.

STANDARD IV: PROGRAM FACULTY

Faculty Qualifications

Faculty members teaching the didactic and clinical courses in the NMDP have appropriate education and experience for their teaching positions and their responsibilities in the program. Clinic faculty have a minimum of two years of experience, and the majority have more than five years of experience— and, in many cases, more than ten. The UT Human Resources (HR) department retains faculty information, such as transcripts, in its “OnBase” electronic system. The NMDP department maintains other faculty information, such as copies of licenses and the like.

The overall composition of the faculty adequately reflects the naturopathic orientation of the program. The program has also recruited several NDs, MDs and DCs to function as preceptors, six of whom met with the Evaluation Team. Faculty and preceptors reported that they met with the NMDP Program Director, were given an overview of naturopathic medicine, and were counseled on the goals of the program. Preceptors signed affiliation agreements, and both faculty and preceptors were trained in the competency and evaluation paperwork and requirements. Two of the MD preceptors who also precept for MD students stated that, with the exception of pharmacology, the ND students were at the same level as the MD students with regard to their training in the areas of history, physical exam, differential diagnosis and case presentation skills.

Faculty Sufficiency

The program has significant logistical challenges regarding faculty sufficiency. While there are only 9 or 10 practicing NDs in Puerto Rico at this time, the program has historically been able to recruit NDs from the US mainland and Canada. The program has also developed a hybrid model where they contract with NDs living on the mainland to teach a portion of a particular course over the Internet via ZOOM. The program then brings the ND to campus for an intensive immersion in the topic—up to 8 hours per day for approximately 4 - 6 days. The students reported that they found this to be a great solution to the deficit of local naturopathic physicians. The use of technology has been judicious and limited, and has not compromised the fundamental residential quality of the program. The program acknowledges that it needs to hire more full time NDs as faculty to lessen the load of the Clinic Coordinator, to provide coherent academic planning, and to meet program delivery needs.

Faculty Orientation and Performance Evaluation

Faculty members reported that early on in the program development they did not receive orientation, but that faculty members who had joined recently did meet with the NMDP Program Director. They stated that the orientation was informative and adequate. The Evaluation Team **suggests** that the program maintain documentation demonstrating that an orientation or “on-boarding” plan is provided to all new faculty members that combines information on the NMDP as well as on UT, including HR and other policies.

UT has developed a strong culture of quality improvement, and it has a well-structured, centrally operated evaluation process for all faculty. The faculty evaluation process includes quantitative feedback from students for each class. According to the evaluation process, student feedback on faculty is compiled by the UT’s Evaluation and Development Office Vice-Chancellor Office, which sends the feedback information to the SHS Dean, who reviews it and sends it to the Program Director, who incorporates it into the individual faculty evaluations. However, when faculty members were queried about their performance evaluations, they stated that they had not been provided any feedback. 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)

Faculty reported that they get direct feedback from students that is generally very helpful. The Evaluation Team was given an example of a situation where students gave the Program Director feedback about a new faculty member who had deficiencies. The Program Director reported meeting with the faculty member, reviewing the deficiencies and developing a corrective action plan. The result was successful according to the Program Director, and the Evaluation Team corroborated this with students.

Faculty Professional Development

All faculty members reported participating in development activities, and several reported receiving some support for continuing education activities—but most had not. However, those who had not received support reported that they had not asked for such support. One faculty

member who presented a poster at a research seminar reported receiving some support for the cost of the seminar registration, but not for travel. The administration reported that there are funds available for continuing education and faculty development, but that faculty must ask prior to attending activities. The Evaluation Team noted as an **area of interest** the following: 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)

Faculty Participation in Program Development and Academic Administration

The Evaluation Team noted that there is some faculty participation in program development and academic administration. Faculty reported that while they are invited to participate, they do not participate as much as they would like due to time constraints. Most of the faculty interviewed work at UT on a part-time basis, many commuting 1½ – 2 hours each way to get to the campus. Given the scheduling challenges and the lack of compensation for meetings, getting faculty to fully participate in university and program activities is a challenge. There are regular faculty meetings, and the minutes reflect some faculty participation. The UT has a Faculty Senate to which NMDP faculty are invited to participate, but again the NMDP faculty stated that they are not able to commit the time to do so. The Evaluation Team saw consistent evidence of program faculty participation in the student selection process.

Faculty also participates in reviewing teaching methods. This is especially important given the small number of local NDs and the challenges in providing diverse instructor knowledge. To help remedy this, the NMDP contracted with ND faculty from the US mainland to teach over the internet via Skype. Students reported that this was problematic, as they could not see the lecture materials at the same time as the instructor. The program then brought in a second television screen to the classroom to display class materials. This still was not satisfactory. Both students and faculty reported that they needed a more sophisticated system. The program has since contracted with Zoom, an internet company that has the technology to broadcast both the instructor and the materials at the same time on the same screen. As noted previously, both faculty and students reported that this is a much more effective way to provide real-time instruction approximating onsite instruction, particularly with the addition of an onsite visit by the course instructor for intensive, face-to-face workshops.

Conditions of Faculty Employment

The UT has a *Faculty Handbook* that describes policies and procedures that apply to NMDP faculty. The NMDP faculty reported that the academic freedom policy is sufficient. SUAGM also has a centralized HR office that is committed to equal opportunity and non-discrimination practices. Faculty recruitment is a challenge in Puerto Rico, as wages are generally lower than on the mainland and there are very few NDs on the island. While the HR department uses CUPA data to determine salary levels, at the same time it is aware of the compensation challenges in several schools such as engineering and business administration, as well as professional programs such as the NMDP. The HR department has flexibility to increase some compensation packages beyond the CUPA determined salary bands on a case by case basis.

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

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)

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)

Determination: Standard IV on Program Faculty is being partially met, with a deficiency as noted.

STANDARD V: STUDENT SERVICES

General Provisions

Services for NMDP students are provided at all levels—system, university, school, and program—and reflect the program’s mission and objectives. Students report a high degree of satisfaction with the services provided, and report that they fulfill both academic and personal needs. UT provides the publications *Normas Académicas Programas Doctorales* (Doctoral Programs Academic Norms) and *Graduate Programs Catalogue*, both of which clearly cover the academic rights, privileges, and responsibilities of students, as well as providing information regarding (among other things) academic standing, course loads, transfer credits, academic probation, suspension, appeals, and readmission. Actions that could adversely affect a student’s status are supported by clearly documented processes that appear fair and allow for student response, as well as appeal to a higher level. All proceedings are confidential and documented, with original files retained at the office of the Vice-Chancellor of Student Affairs.

The *UT Student Handbook* provides information regarding the expectations for student conduct for the university population at large, including policies on plagiarism, sexual harassment, weapons, substance use on campus, and adjudicating student grievances for issues between students and between students and faculty or staff. There have been no formal complaints registered by NMDP students. However, a number of issues of concern to the students have come up such as faculty credentials, course planning, and short notice of curriculum changes. These have been reported to the SHS Dean and/or the NMDP Program Director, and documentation regarding the issues (including their resolution) is kept by the Program Director. Students reported that any concerns they have raised have been addressed effectively and within a reasonable timeframe. While there is clear evidence that students have a valued voice with respect to the NMDP, it is not clear that a formal process is in place to solicit their views. If they wish, students may report concerns regarding the clinical experience through a common student email account.

The UT is in compliance with Clery Act and collects and discloses data regarding criminal activity in the institution. Security is present and visible on campus. The SUAGM system also annually reviews and publishes an OSHA compliant Systemic Evacuation Plan outlining responsibilities and actions in the event of an emergency situation or major disaster. The plan is publically available online.

Admissions

The NMDP's admissions policies—including requirements, prerequisites, and minimum qualifications—are published in the *Graduate Programs Catalogue*, and meet all applicable laws with respect to non-discrimination and physical challenges. Admissions applications are initially screened for basic requirements at the university level by the Registrar/Vice-Chancellor's Office of Turabo. Original student records are maintained by that office, while the NMDP Program Director maintains a copy of the student file for each successful applicant. Requirements include:

- Bachelor of Sciences from an accredited Institution with a minimum 2.85 GPA.
- Admission application
- Official credit transcript
- Copy of updated resume or other record of professional experience and achievements
- Three letters of recommendation
- A personal essay discussing professional and educational goals
- Results of the Graduate Record Exam (GRE) or the Spanish Test of Aptitude for Graduate Studies (EXADEP).
- A non-refundable admission fee of \$75.00.
- Evidence of the following pre-requisite course work (science courses taken over 10 years prior to time of application are subject to review):
 - 12 semester credits in Biology with Laboratory (including Anatomy and Physiology)
 - 8 semester credits in Chemistry with Laboratory
 - 4 semester credits in Organic Chemistry
 - 3 semester credits in Physics
 - 6 semester credits in Psychology
 - 6 semester credits in English
 - 6 semester credits in Humanities
 - 3 semester credits in Spanish
 - 1 semester course in Algebra or Pre-Calculus

Once the academic requirements have been confirmed, the application is forwarded to the SHS. The Program Director appoints the Admissions Committee, which is minimally composed of the Program Director and two faculty members. The Committee reviews the applications and selects qualified candidates for interview. During the interview, a standard rubric is used to assess personal characteristics. The committee as a whole makes the final admissions decisions. Only those applicants who meet all of the entrance requirements are invited for admission, though some extensions have been granted for the submission of specific materials. There is no minimum admissions number or quota in place.

Admissions policies comply with federal and Puerto Rican laws, and include refund and cancellation standards, information regarding transfer credits, and advanced standing. Any documentation from a foreign institution is assessed by a reputable third party agency.

Admission standards appear to be consistently applied, and any exceptions are based on extraordinary circumstances and are well-documented. The Evaluation Team noted the following **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)

Marketing materials pertaining to UT and all of its programs are managed by the Marketing and Admissions office, overseen by the office of the Vice-Chancellor of Student Affairs. The materials reviewed are clear and accurate with respect to the NMDP.

Student Records

All student records at Turabo are maintained in accordance with FERPA guidelines, and information is released only to the student. There are established policies that allow for granting a student's request to see their records within a reasonable time frame, and for a student to allow someone else to access their records on the student's behalf.

The program's recordkeeping appears to be complete and accurate. Students are made aware of the Institutional Policy for the Retention and Disposal of Academic Records. This policy states that records will be retained for a specific length of time by the following offices: Registrar Office (including records pertaining to completion of Program requirements) – for life; Admission and Financial Assistance Office – for five years; and the Treasurer's Office – for five years if a student has no debt, and for life if a student has a debt with the Institution. The NMDP retains a student's clinical records for five years after completion of his/her degree. After the five-year period, in May of each year, program graduates will be informed via the email address on file that their academic records will be disposed of, and the date that this will be done. Graduates will have the option of retrieving their records at the program office. Days and times for retrieving records will be included in the electronic communication. After the deadline for retrieving records has passed, records will be properly disposed of. Graduates will expressly release the program of the responsibility of any record not claimed after the deadline.

Between UT, SHS, and the NDMP, data are maintained that facilitate the compilation of records and statistics. With a total of 46 current students and no graduates to date, there are limited NMDP data available. Only one student has left the program (voluntarily) and has been readmitted, and there have been no suspensions to date. Information regarding the number of applicants to the program, their ages, genders, ethnic information and veteran status, is maintained in the UT Admissions Office. Details regarding those registered are available at the program level as well. The UT Financial Aid Office maintains student loan default information, currently 12%, but as there have been no graduates from the program, this information is not yet relevant to the NMDP.

Financial Aid

The Financial Aid Office provides services to all students at UT. Financial Aid programs are administered, and records are maintained, according to state and federal requirements. Information is provided to students in the *Student Handbook* regarding financial aid options, and is also provided in great detail online. Options available to NMDP students are Direct

Unsubsidized Loans, PLUS Federal Loans, and the state Graduate Supplementary Educational Aid program. Funds are managed according to applicable laws and dispersed according to prescribed formulae.

Financial Aid Office staff members regularly participate in workshops and conferences to keep up to date. Topics have included annual changes in federal and state regulation, changes in the Banner platform and system, financial aid system evaluation workshops, and specialized database systems workshops (e.g., OnBase application). In addition to these workshops, staff receive regular presentations and seminars, and participate in discussions through the following organizations:

- *Asociación de Administradores de Asistencia Económica Estudiantil de Puerto Rico* (Puerto Rico Financial Aid Administrators Association).
- National Association of Student Financial Aid Administrators (NASFAA)

Students who receive financial aid participate in an entry interview during which they are encouraged to apply for funds only to cover direct expenses of the NMDP, and to be sure to apply any funding received only to costs of education. Resources and personal financial counseling are available to students at any time to assist them in managing money. An exit interview is conducted when the student finishes the program or leaves the institution. During this interview the student receives counseling and an orientation regarding loan repayment. Throughout the financial aid process—from eligibility through entry, disbursement, and exit interview—students are oriented regarding funding mechanisms and how to maximize them.

Counseling

UT has an office of Student's Quality of Life and Wellness, overseen by the Vice-Chancellor of Student Affairs. This office is dedicated to student wellbeing and success, and provides both academic and personal counseling services for students. Services are offered in various forms including individual counseling, workshops, seminars, one-on-one counseling, and tutorial sessions. Staff providing these services have been trained appropriately, and all services are strictly confidential.

At the program level, student progress is assessed at the end of each term. The SHS Academic Advisor collaborates with the NMDP Program Director in the evaluation of students' records to monitor their progress. Students identified by a faculty member or a clinical supervisor as needing support or academic monitoring are referred to the Program Director, who makes the appropriate referral for services and/or meets with the student to make appropriate academic recommendations. If it is determined that a student lacks the ability to complete the program, a referral process is initiated for academic counseling and advice. While it has not yet been necessary, students would be counseled out of the program if it becomes apparent that they are incapable of successful completion.

The Evaluation 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.

Official Publications and Online Resources

Various UT publications provide clear information to students and the public regarding the NMDP. These include the *Student Handbook*, the *Graduate Programs Catalogue*, and the *Academic Standards for Doctoral Programs*. There is also an abundance of information available on the UT website. These sources cover the university and NMDP mission and objectives, admissions requirements and procedures, transfer credits, advance standing, tuition/fees/refunds, financial aid opportunities, academic performance requirements including policies and procedures regarding academic progress and program completion, rules for student conduct, student disciplinary and grievance procedures, faculty professional designations, members of the system governing board and administration (including their positions), the non-discrimination policy, academic calendar with program sequence and description of courses, description of learning and physical resources, and information on legal requirements for licensure. The NMDP also clearly publishes its status regarding CNME, and provides contact information according to CNME policy. What is not readily available is information regarding which courses and/or faculty may not be available during a given academic year. The Evaluation Team **suggests** that information regarding the availability of specific courses and/or faculty be included in each annual publication of the program calendar.

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.

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)

Determination: Standard V on Student Services is being met.

STANDARD VI: PROGRAM OF STUDY

Program Development, Delivery and Integration

The program of study of the NMDP can be completed in 4 years and consists of 278 credits (approximately 4,100 clock hours). Credits assigned to individual courses appear to be consistent with accepted practices in higher education, though the manner in which they are assigned was not published in the materials provided. The language of academic instruction is primarily Spanish, although all PowerPoint presentations and examinations are delivered in English to assist in preparing students for writing the NPLEX I and II examinations. The NMDP has also committed to supporting students in NPLEX preparatory training in English once the program attains candidacy status with the CNME.

The program is residential in that all courses are delivered in-class. As noted previously, some coursework is provided to students via web-based means, as the instructors are located on the US mainland.

The course objectives relate to the program objectives as noted in the Standard I, though they have not been completely mapped. The UT syllabi follow a standard institutional format and meet all of CNME's content requirements. The curricular sequence allows for introduction and reinforcement of knowledge and skills followed by direct application of the knowledge and skills, and does so in a step-wise progression with increased autonomy over time.

There is a heavy emphasis on Oriental Medicine in terms of credits, which is reflected in the first program objective: "Provide a comprehensive education in Naturopathic **and Oriental Medicine** (emphasis added), through knowledge integration and application consistent with a holistic approach to medicine". The principles of naturopathic medicine are implicitly interwoven throughout the program, as well as directly in the specified courses related to naturopathic philosophy. The program employs a variety of instructional methods—including laboratories (anatomy, clinical skills), group presentations, and web-conferencing—though overall there is heavy emphasis on lecture-based teaching.

The process of course revision appears to be flexible in that a faculty member, administrator, or group of students can recommend modification of the program. Proposed curricular revisions are discussed by the faculty member with the NMDP Program Director, and then presented to the SHS Curriculum Committee for approval. For larger-scale changes such as introducing new courses, modification of course descriptions, or changes in prerequisites or course elimination, the proposal is submitted by the SHS Curriculum Committee to the Vice Chancellor, who reviews and forwards the request to the UT Academic Board for approval.

Academic Component

The curricular sequence provides a logical way for students to develop the required knowledge, skills, attitudes, and behaviours to prepare students for the assessment, diagnosis and treatment of patients following naturopathic principles, philosophy, and clinical theory and practice. There are appropriate courses in the Basic Science stream. These courses support the Clinical Science Education stream (example of courses are Human Pathology, Clinical and Physical Diagnosis, Laboratory Diagnosis, Pharmacology). Students then acquire knowledge in the Naturopathic Clinical Science Courses which begin in the third year, and continue into the fourth year. The Naturopathic Medicine Philosophy and Practice Courses are introduced in the first term of the program, and also are found at the last term in fourth year. The clinical curriculum includes the following Naturopathic Clinical Practice Courses: Diagnostic Imaging Practicum, Field Observation, Laboratory Results Practicum, Field Observation, Clinical Secondary Shifts, Clinical Primary Shifts and Knowledge Integration. The program supports students in advising patients on prevention and wellness in the course Health Promotion and Disease Prevention. Research methodology is taught in the Health Sciences Course stream in courses such as Clinical Research Methods, Clinical Research in CAM and Evidence-Based Practice Project. The development of research competencies for students and faculty is discussed under Standard X.

As noted above, the curriculum is heavily weighted towards acupuncture and Oriental Medicine, which is manifested in a strong emphasis in acupuncture management as seen in the patient charts. In Puerto Rico, there are a limited number of professionals (including naturopathic doctors) who are able to deliver acupuncture to patients. The number of credits and contact hours for acupuncture and Oriental Medicine surpass those of all of the other disciplines. Oriental Medicine courses have 21 credits represented by almost 300 contact hours; in contrast, Physical

Medicine has 12 credits and up to 240 hours, Clinical Nutrition has 12 credits at 180 hours, Botanical Medicine Courses have 11 credits with 210 hours, Homeopathic Education courses have 8 credits and 120 hours, and Mind-Body Medicine has 6 credits and 90 contact hours. The Evaluation Team *suggests* that a review of the allocation of contact hours for each naturopathic modality be undertaken to ensure that students have a more holistic and varied approach to patient assessment that reflects the full scope of management expected of primary care naturopathic doctors. This could help address a concern identified below.

Clinical Education Component

The clinical education component of the program is competency based. It provides an opportunity for students to integrate naturopathic principles, didactic knowledge, clinical theory, and professionalism into the clinic encounter. Students enter the clinic as observers, then as secondaries, and gradually develop their skills to take on a primary role. There are several opportunities to collaborate with providers in other disciplines. The primary clinical training facility is located in the SANOS clinic, an inner city facility for underserved populations. While the ND examination rooms are in their own area of the clinic, there are other providers working in the building. Students reported that they are seeing an adequate number of patients and that there is good diversity of conditions represented by these patients. The one patient population that students reported as lacking was pediatrics.

The second clinic location is the Pitirre Clinic, a facility treating patients with addictions located at the Jose Enrique Arnau Hospital in Caguas—about a 40-minute drive from UT. This clinic has medical doctors, psychologists, social workers, massage therapists, and other rehabilitation providers. Evaluation Team members met the Medical Director of the Pitirre Clinic as well as the NMDP Clinic Coordinator. These two reported that the staff and the patients all greatly appreciate the services of the naturopathic student interns.

The Evaluation Team visited both clinics, observed a clinic shift at the SANOS clinic, and reviewed over two dozen charts from both clinic locations. During the SANOS clinic shift the Evaluation Team observed faculty and students discussing several cases including components of counseling, nutrition, lifestyle modifications, and naturopathic principles.

Medical charts are a record of patient visits and are an integral part of clinical interactions. These charts document what took place in any given visit, including the history that the patient provided, the examinations that were performed, and the diagnosis for the patient's presenting illness—along with the intern's clinical thinking as demonstrated by the differential diagnosis, the therapeutic plan for the visit and, in the case of naturopathic clinicians in a teaching facility, the incorporation of naturopathic principles in the clinical decision-making process. The Evaluation Team has two concerns relative to charting.

First, 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. For example, every chart audited had an acupuncture treatment. At the same time, only one chart had a western botanical formula, and only one had a Chinese patent medicine prescription. Several charts contained copies of chart notes from a chiropractic clinic where students perform physical medicine modalities, but the Evaluation Team did not see any physical medicine modalities utilized in any of the visits to the SANOS

clinic in the audited charts. There were several charts that had homeopathic remedy prescriptions, but no rationalizations were provided for the prescriptions. 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)

The Evaluation Team had a more general **concern** about the patient charts they observed, in that the 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 observed that almost every chart they audited contained a diagnosis and a comprehensive problem list in the assessment portion of the SOAP note. The Evaluation Team did not, however, see a single differential diagnosis in any of the charts. Almost every chart contained vital signs along with a Traditional Chinese Medicine (TCM) tongue and pulse diagnosis. The Evaluation Team saw only two charts with comprehensive physical exam documentation, though they reviewed multiple new patient encounters or “first office calls.” In one case, for a returning patient, a new diagnosis was documented, but no pertinent physical examination was performed. The Evaluation Team did not see any indication in any of the audited charts of the incorporation of naturopathic principles, nor any mention of clinical thinking in any part of the charts (the template used in the electronic health record system at Pitirre Clinic did list the naturopathic principles, but the location where the template displayed had no principles showing). The Evaluation Team **recommends** that the NMDP ensure that patient interactions are complete and sufficiently documented. (Std.VI.4a, b, c & i)

The Evaluation Team notes the following **Area of Interest**: Currently students have insufficient opportunities to perform certain clinical examinations (gynaecological and digital rectal examinations) during their training. Of the 22 student interns that the Evaluation Team interviewed, four reported having performed a female bimanual examination, but those were performed in Nicaragua at the Natural Doctors International site. Four students had performed a DRE exam at the SANOS clinic. 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). A handful of students are provided the opportunity to perform such examinations when precepting with specific MD clinical faculty.

The Evaluation Team **suggests** that the NMDP consider organizing either women’s and men’s wellness clinics, or hire models to provide students with needed practice in these areas. One of the MD preceptors told the Evaluation Team that he has found a gynecologist who has offered to let some students to precept with him and perform GYN examinations. If this opportunity comes to fruition, it will help some of the students gain the needed experience.

The Evaluation Team noted the following as another **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)

The clinical training program and the structure of the training clinics provide students with the opportunity to develop professional relationships with patients as well as faculty, colleagues, and other healthcare practitioners. Both teaching clinics are set in larger clinical facilities with other providers seeing either the same patients or other patients. In addition, the program has created a

set of preceptor sites with MDs and DCs, as well as NDs, thus providing additional opportunities to work closely with other health care providers. The Evaluation Team met with six preceptors (three MDs, one DC, and two NDs). The NDs operate in integrative settings and one of the MDs works in an emergency ward where interns are invited to observe him. Both the preceptors and the interns reported that the students are exposed to a wide variety of conditions and diseases.

The students reported that they are actively involved in recruiting patients through their own efforts as well as community outreach and fairs. In addition, the training clinics provide opportunities for students to work with underserved populations. Students reported that the one socio-economic group that they did not get to work with is wealthier clientele. At the SANOS clinic, the students have the opportunity to see how the receptionist interacts with patients regarding scheduling, checking in, collecting payment, and checking out.

Student interns reported that they are very satisfied with the course on practice management that is offered through the UT system. The instructor offers regular monthly conferences and is available to review their business plans even after they graduate. Both faculty and student members of the UT community (including the business class instructor and other administrators) take advantage of the naturopathic services at SANOS and are greatly impressed with the quality of care delivered.

The NMDP provides a variety of clinical opportunities to students including primary and secondary roles in the clinic, precepting, clinic outreach, and clinical skills labs among others. The Evaluation Team notes the following as an **Area of Interest**: It appears that the way the NMDP calculates clinical hours is inconsistent with the CNME clinical education requirements. (Std.VI.C.5a, b, d & e)

The Evaluation Team observed a faculty-to-student ratio of 1:6 at the SANOS clinic. The students reported that they had sufficient patient contacts to complete their competencies and attain the required numbers to graduate, although to date, no one has graduated from the program.

Clinic Administration, Resources, and Facilities

The NMDP has hired a Clinic Coordinator to oversee all aspects of the clinical portion of the NMDP. The Clinic Coordinator is directly involved in curriculum design and implementation, as well as faculty oversight and development of clinic policies and procedures.

The SANOS Clinic facility is located in the heart of the town of Caguas a little over two miles from the UT campus. This is the official NMDP clinical practice site and serves an average of 10 patients on a daily basis four days a week. The Clinic is divided into eight main rooms. The waiting room is provided with 10 chairs, educational magazines, patient education guidance handouts, and a children's corner. It is both a child-friendly area and a comfortable space for adults to wait. The reception is located near the waiting room, but is separated by a sliding glass window that serves as a private location for the receptionist. The patient charts are safely kept in a locked cabinet behind the reception area. Student interns access medical records either from the receptionist or from their clinic supervisor. The NMDP is in the process of changing patient charting from paper to an electronic format using eHealth Partners software, which includes records backup services.

There are three rooms that are used as examination rooms. One is used for physical medicine and has an electrical manipulation table, hydrocollator machine, interferential, and micro current machine. All three rooms are equipped with a biohazard sharps container with lid, wall-installed evaluation and diagnostic kits (e.g., otoscope, sphygmomanometer), hand sanitizing liquid, alcohol swabs, tongue depressors, and a container that keeps acupuncture needles secure. The Clinic Coordinator ensures that supplies are inventoried and stocked. Students and supervisors can request supplies through the receptionist. The Clinic has storage closets that hold an EKG machine, an ultrasound machine, TCM cupping equipment, and an infrared machine. Another cabinet provides storage for disposable sheets, gowns, massage oil and ultrasound gel, and acupuncture inventory (e.g., needles, seeds, moxa, and plasters).

A conference room is available so students can congregate to discuss the history-taking findings, study, and meet with the clinical shift supervisor. The conference room contains clinical reference books and a computer with wireless internet access, which offers student interns access to e-books, medical references, professional links, and a variety of opportunities to research cases and consult treatment protocols. References are available in the areas of clinical nutrition, naturopathic and oriental medicine, drugs, botanicals, and nutritional interactions and contra indications. The conference room is equipped with a blackboard and anatomical models.

The Evaluation Team noted that while the SANOS clinic is sufficient for training, there are significant limitations. Due to limited space a dispensary has not been developed as the NMDP would like. Currently SANOS has a small dispensary with a variety of supplements available for the clinic patients to purchase. The supplement inventory was purchased taking into account the type of patients and conditions that are seen SANOS the most. SANOS makes available to patients supplements not available at the dispensary by ordering through *Emerson Ecologics*. Patients pay with their credit card and the supplements are delivered directly to them. The clinic supervisor and the primary student discuss the dosage and frequency of supplements, and provide patients with a written plan before they leave the clinic. Currently, NDs do not do phlebotomy in Puerto Rico, so patients must take their laboratory requisitions to other locations to get their blood drawn. In addition, by law NDs also do not perform papanicolau smears, so these too are referred out. Currently, the program does not have the capacity to compound teas or tinctures.

As noted previously, clinical training occurs at two clinical facilities, along with the preceptor sites located at various clinics in Puerto Rico. While the current training facilities are adequate for the current size of the program, with enrollment growth they will need to expand. This matter is addressed more fully in Standard XI.

The team interviewed both the NMDP Program Director and Clinic Coordinator about administrative support for the clinical portion of the program. The Clinic Coordinator no longer has classroom teaching duties, but still supervises three clinic shifts. This represents 0.60 FTE dedicated to supervision, leaving 0.40 FTE to do all of the administrative work required to oversee the clinical program, which is insufficient. This concern was addressed previously in Standard II. The Evaluation Team *suggests* that the NMDP hire an additional supervisor to relieve the Clinic Coordinator of some of her supervisory responsibilities, as well as either hire an administrative assistant to help with clerical duties or train the clinic front desk staff to perform more administrative support duties.

The Evaluation Team reviewed written affiliation agreements between affiliate training sites and the program, as well as evaluation reports of student participants. The CNME standards appear to be met in these evaluations.

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)

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)

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).

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)

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)

Determination: Standard VI on Program of Study is partially being met, with the deficiencies noted.

STANDARD VII: EVALUATION AND ASSESSMENT

The UT has a highly developed a culture of assessment within the institution. The Assistant Vice-Chancellor of the Assessment Office promotes the training of faculty in the field of assessment and student learning, and supports the administrative units by training the administrators in institutional assessment (in this case, the NMDP Program Director). An Assessment Report is completed at the course level, program level, and school level, as well as other areas of the institution (student services, information resources, and research). The Assessment Office assists in the distribution of surveys and questionnaires to obtain evidence of student learning and collect data and analyze reports.

The NMDP Evaluation Plan is based on the seven programmatic objectives, and evaluates each of these objectives within three domains: student academic and clinical performance, program graduates' professional success, and overall program outcomes and effectiveness. The measures that are—and will be—employed are varied, and comply with each of the domains. In the

student academic and clinical performance areas, measures include review of student grades, students' clinical evaluations, student presentations, and participation in specific activities. Professional success of program graduates will be assessed via graduates' satisfaction questionnaires, NPLEX pass rates, employer satisfaction questionnaires, graduates' leadership roles, patient satisfaction questionnaires, graduates' scholarly works, and exit interviews. Finally, overall program outcomes and effectiveness will review NMDP graduation rates, graduates' leadership roles, employers' satisfaction surveys, NPLEX pass rates, NMDP retention rates, and patient satisfaction survey. The NMDP Academic Director is required to complete a Program Level Assessment Report annually. The SHS Dean will review the data with the Academic Director of the NMDP to determine areas of improvement and commendation, and how to implement any recommendations that are made. Some of the Evaluation Plan has been implemented (student level), while the professional success and program level assessment will be implemented once students graduate from the program and are able to write board examinations.

In addition to the above, faculty are expected to complete a Course Assessment Report at the end of each of the courses, where they identify the assessment tools used in the course, outline the expected results, and analyze the actual results to determine whether the expected level of achievement was met. Faculty are expected to provide corrective actions and recommendations to improve while subsequently teaching the course. Unfortunately, not all faculty have complied with this process; consequently, the Dean is considering strategies to ensure that all NMDP faculty complete this report.

Recommendations and corrective actions articulated in the Assessment Reports may lead to allocating increased resources to improve deficiencies in the program—either at a course level or a program level.

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

Determination: Standard VII on Evaluation and Assessment is being met.

STANDARD VIII: CONTINUING MEDICAL EDUCATION

At this time the NMDP offers no continuing medical education.

STANDARD IX: LIBRARY AND LEARNING RESOURCES

Organization and Administration

The library and learning resources include a main campus building and six branch locations, as well as a virtual library. These areas are overseen by the position of Vice-Chancellor for Information Resources, whose current incumbent holds a doctoral degree in Library and Information Science. The current library director holds several masters degrees, including an MLS in Library and Information Technologies. The library director has direct access to senior management through her position on the Academic Board, and through the Vice-Chancellor, to whom she reports, and who sits on the university Administrative Council together with the Chancellor and faculty and student representatives.

Each branch library is supervised by a librarian holding a minimum of a Master's degree in Library and Information Science. Current staff includes ten librarians holding Master's degrees, and a support staff of 11 library assistants. Professional development of staff is encouraged and supported.

The virtual library undergoes continuous improvement. Hardware, software, and resources are upgraded on a regular basis, and technical support is readily available both onsite at the main campus, and through a well-staffed (15 staff members) Information and Telecommunications Office overseen at the SUAGM level. The library's strategic plan includes resources to ensure their responsiveness to an evolving technological environment. This includes a multi-year Equipment Replacement Plan to maintain the technological infrastructure up to date. Policies and procedures are in place that govern the use of library services, that outline library operations, and are readily available to the library patrons.

Planning and Evaluation

Planning for the technology aspect of the learning resources is coordinated through the SUAGM Technology Development Plan. The university is guided through a three year plan that provides the basis for decisions relating to technological programs and equipment. The current plan includes the implementation of a wireless communications strategy that provides access to information and learning opportunities anytime and from anywhere, and the development of a funding strategy to replace faculty and staff computing technology every three years. In May and June of each year, UT prepares the annual work plan for the following year based on assessment outcomes of the previous year. There are published questionnaires to solicit this information including the Library User Satisfaction Questionnaire, and the Library Assessment Tool.

The reference librarian assigned to the SHS provides current information regarding available resources to faculty to assist them in updating their syllabi. The library develops its collections in accordance with the priorities and mission of the program, and actively seeks recommendations from faculty and administrators for the acquisition and development of library resources and services. Since 2008 meetings have been conducted every semester with the NMDP Program Director to identify and discuss the specific learning resource needs of the program.

Budget

The library has its own budget, which is used, among other things, to enhance both the virtual and print resources, provide for staff salaries and development, and maintain equipment, facilities and other resources.

Access

Library resources are available 24/7 through the virtual library, and the physical resources are available 7 days a week according to a reasonable operating schedule. Information regarding library resources is available through the Online Public Access Catalogue (OPAC)—both via computers onsite and remotely. Items can be searched by title, author, subject or classification number. Resources are catalogued according to the Library of Congress Classification System. The Voyager system now being used by the library allows for student access to the catalogue

from home, and allows faculty to search and mark items for reserve, print, download, or to email the results.

Orientations regarding the use of the physical library, the virtual library, and the databases are always available to new students and faculty. At the beginning of each year, program faculty coordinate an orientation of the library for new NMDP students. Library staff are also available to assist users as needed. The Turabo Information Literacy Program goal is to develop advanced search skills in its users, as well as the ability for critical analysis of information.

Collections

The library provides comprehensive and current information resources that support the needs of the program and research. Resources are available in various formats, both physical and virtual, and by inter-library loan agreements with universities in Puerto Rico and the United States. Faculty participates in the selection and evaluation of resources. Faculty and students commented on the ease of availability of any required or requested resources. Reference materials are kept near the main desk at the Gurabo campus library, and are available to students, faculty and staff during hours of operation. Following a model used at the Vatican, there are plans to protect some of the historic collection by providing high-quality, authentic-looking duplicates of the originals to be available for reference, while preserving the true originals by placing them in secure storage.

It was noted in the *Self-study Report* that more could be done to protect the library collection from theft. No electronic anti-theft technology was observed at the main campus ground floor entrance/exit. The Evaluation Team **suggests** that the University continue with its plan to implement policies and procedures to protect the library collection from loss.

The Evaluation Team also **suggests** that the University continue with its plan to establish a Library Advisory Committee to provide advice and feedback to the library.

Facilities

The physical facilities at the library include an Electronic Information Laboratory equipped with 78 computers available for the academic community, as well as 11 computers in the reference area. There is another computer lab on the second floor, which is used primarily for information literacy programs. Further, there is a TV studio equipped with HD cameras onsite. There is a seating capacity of 508, including tables, cubicles, and study rooms. There is also a separate study room for doctoral students.

Determination: Standard IX on Library and Learning Resources is being met.

STANDARD X: RESEARCH AND SCHOLARSHIP

Senior administrators for UT and the NMDP both report a commitment to supporting research. Students also reported that the NMDP supports their interest in participating in research, including mentoring. Faculty members, however, informed the Evaluation Team that while there is some structure within UT to support research, there has been little in the way of release time or other financial support. The work is primarily voluntary on the faculty members' own time.

Senior UT administrators informed the Evaluation Team that contracts are negotiable to include release time for research. Faculty members who met with the Evaluation Team were not aware of this. In addition, many of the faculty members are part time and would require a different compensation structure in order to participate in research.

Given that the NMDP has only fairly recently started, the Evaluation Team was very impressed with the state of research in the program. 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. The Evaluation Team noted the following **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 NMDP faculty and students in developing research literacy and an understanding of methodology, and provides opportunities to engage in research. (Std.X.A.2)

There is annual training on intellectual property rights. The UT has an Institutional Review Board, and the NMDP follows the IRB's policies and procedures. Faculty and students have academic freedom to conduct research and publish.

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.

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)

Determination: Standard X on Research and Scholarship is being met.

STANDARD XI: PHYSICAL RESOURCES

UT has a beautiful, spacious main campus that is comprised of 16 buildings located on 140 acres of well-maintained green space 15 miles southwest of San Juan. The entire campus, as well as satellite campuses and clinics, are ADA compliant and fully accessible. The library, NMDP classrooms, student services, financial aid, administrative and faculty offices are currently all located on campus. The university is building a new facility to house the SHS, including the NMDP. The Evaluation Team noted the following **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.

The new facility is a 40,000 sq. ft., single-story structure located adjacent to the main campus with space designed for classrooms, multidisciplinary clinics, laboratories, and faculty and

administrative offices. There will be a designated area for the NMDP of 1,604 sq. ft., including four clinic rooms, a conference room, a dispensary, and a shared hydrotherapy room. The facility is scheduled to be opened in January 2016 and will centralize NMDP administration, clinic, and students. Program faculty and staff have been involved in planning for the new space. Originally only three treatment rooms were planned for in the NMDP area, but with input from the program, the space was redesigned to accommodate a fourth clinic room. There do not appear to be any issues with maintaining equipment and supplies. The Evaluation Team noted the following **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. The new SHS building has been designed and constructed to support a second floor, allowing for expansion, and the Evaluation Team encourages UT to avoid delays in planning for this additional construction.

The current clinic facilities have been described in Standard VI.

Assignment of capital funds is done annually by SUAGM, and the UT is assigned \$5 – \$10 million per year in capital improvements funds, depending on projects approved. Construction of the new SHS building is a projected investment of \$12 million.

UT clearly places an importance on maintaining their physical resources. The grounds and buildings are well maintained, clean and in good repair. The physical plant has a staff of 14 for general maintenance of the facilities, and many services are sub-contracted (cleaning, maintenance of electrical substations, maintenance of swimming pool and fountains, waste collection, fumigation, etc.). An agronomist and 13 additional employees maintain the green areas. Security services are provided by two companies: St. James Security is in charge of overall security providing 24 hour coverage; and Globe Security is in charge of monitoring the 320 security cameras on campus. The main campus is fenced, and access is gained through a system of gates with security check points. A report is published annually compiling all of the criminal activity that has taken place on campus. An OSHA compliant emergency plan is published annually by SUAGM. Staff and faculty are advised of initial responsibilities and actions to follow to protect the university community in the event of an emergency or natural disaster. All structures are designed and built to state codes and certified by the Puerto Rico Fire Department.

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)

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)

Determination: Standard XI on Physical Resources is being met.

COMPLIANCE WITH CNME POLICIES

The Team found the program to be in compliance with CNME's policies.

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

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

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

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

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

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

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

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

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

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

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

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

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)