

**COUNCIL ON NATUROPATHIC MEDICAL EDUCATION**

**Evaluation Team Report**



**National University of Health Sciences**

**School of Naturopathic Medicine**

**NATUROPATHIC MEDICINE PROGRAM**

**Lombard, Illinois**

**Comprehensive Visit for Reaffirmation of Accreditation**

**June 22-24, 2022**

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

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Comprehensive Visit for Reaffirmation of Accreditation**

**National University of Health Sciences  
School of Naturopathic Medicine  
Naturopathic Medicine Program**

**Lombard, Illinois**

**June 22 – 24, 2022**

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## **INTRODUCTION**

### **History of the Institution and CNME Recognition**

The University was founded by John Fitz Alan Howard, DC, in 1906 in Davenport, Iowa, as the National School of Chiropractic. It was moved to Chicago in 1908 for the purpose of providing a more scientifically rigorous academic culture in which to expand and develop the institution and was chartered and incorporated under the laws of the state of Illinois. In 1942, National became a not-for-profit, tax-exempt educational and research institution in accord with of Illinois and federal law.

The Office of the Superintendent of Public Instruction of the State of Illinois granted official status to National as a degree-granting institution in 1966 for both the Bachelor of Science in human biology and the Doctor of Chiropractic degrees. Also in 1966, National was accredited by the Commission on Accreditation of the Council on Chiropractic Education of the American Chiropractic Association. In 1968, the two-year pre-professional requirement for admission became effective, a three-year pre-professional requirement was implemented in 1997, and a pre-professional baccalaureate requirement was instituted in 1999. The Doctor of Chiropractic Degree Program was approved by registration with the State Education Department of the State of New York in 1972. In 1974, the College was recognized as a Candidate for Accreditation by the North Central Association of Colleges and Secondary Schools and was accredited by North Central in 1981.

In 1963, the National College of Chiropractic moved to a 20-acre campus in Lombard, Illinois, where it developed facilities for the exclusive use of chiropractic educators. More recently, the campus has expanded to 35 acres, which includes five academic structures and four dormitories. Clinical facilities are located in Chicago and Aurora, Illinois, and St. Petersburg, Florida, where there NUHS has a branch campus.

National has long been a leader in chiropractic education. Beginning in the late 1980's, the vision of the then President of the College was that practitioners from a variety of complementary and alternative medical fields should be able to study together and work together in order to develop a strong sense of collegiality and collaboration. In 1993, the Board of Trustees decided that the College would begin to move toward expansion of its educational offerings and evolve into a multipurpose university; in September 2000, the College officially became National University of Health Sciences.

In 2006, following an institutional self-study, request for change, and approval (change in affiliation status) with the Higher Learning Commission (HLC) of the North Central Association of Colleges and Schools, new programs in naturopathic medicine, acupuncture and oriental medicine were initiated and began enrolling students. In March 2008 the Council granted candidacy status to NUHS's doctoral program in naturopathic medicine, and in October 2012 the Council granted initial accreditation of the ND program for a period of four years. In June 2016, the CNME reaffirmed the accreditation of the ND program.

The University currently houses three Colleges: College of Allied Health Sciences, the College of Professional Studies, and the Lincoln College of Post-professional, Graduate and Continuing

Education. Current programs include programs in Massage Therapy, prerequisite courses for first professional programs for those whose baccalaureate degrees do not meet requirements, Bachelor of Biomedical Science, and graduate programs in Chiropractic Medicine, Naturopathic Medicine, Acupuncture and Oriental Medicine, Diagnostic Imaging, and Advanced Clinical Practice. The university has a focus on broad scope primary care practice for professional degree programs and a commitment to integrative medicine.

### **Nature of Visit and Structure of the Report**

The evaluation visit consisted of both on-campus meetings, as well as several meetings conducted via videoconferencing. During the course of the evaluation visit, the team met with the following individuals and groups:

- Several Members of the Board of Trustees
- President
- Vice President, Academic Services
- Vice President, Administrative Services/Director of Alumni & Development
- Vice President, Business Services/Director of Management Information Services
- Director, Communication and Enrollment Services
- Director, Facilities and Security
- Director, Financial Aid
- Director, Financial Services
- Director, Human Resources
- Director, Learning Resource Center
- Dean, Clinics
- Dean, College of Professional Studies-Illinois
- Dean, Lincoln College of Post professional, Graduate, and Continuing Education
- Dean, Research
- Dean, Student Services
- Dean of Institutional Effectiveness
- Assistant Dean, Doctor of Naturopathic Medicine Program
- Chair, Basic Sciences-Illinois
- Chair, Clinical Sciences-Illinois
- Faculty, Clinic
- Faculty, ND Program
- Chief Clinician
- Registrar
- Librarian, Director
- Librarian, Reference
- Research Resident
- ND Students

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

The term **is concerned** denotes an aspect of the program or institution that the Team has 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 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 to a specific standard or policy in the team report.

The word **suggests** identifies a non-binding, collegial comment by the Team intended for the purpose of programmatic or institutional improvement. The Team hopes that the suggestions will be helpful to the program and institution. Team suggestions do not 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 Team believes the College is in compliance with the particular Standard.

The evaluation team sincerely thanks the Doctor of Naturopathic Medicine Program, the College of Professional Studies and the National University of Health Sciences for hosting the CNME evaluation team to conduct the 2022 visit for reaffirmation accreditation, and for the hospitality, cooperation and courtesy the members were shown throughout the visit.

## **STANDARD I: PROGRAM MISSION AND OUTCOMES**

### **A. Mission and Outcomes**

NUHS’s ND program mission, which NUHS refers to as its “Purpose Statement,” reads as follows:

*The purpose of the Doctor of Naturopathic Medicine Program at National University of Health Sciences is to create competent naturopathic physicians who are ethical, compassionate, and effective practitioners of the science and art of naturopathic medicine.*

This mission, which was last reviewed and revised in 2016, meets CNME’s requirements and accurately reflects the nature of NUHS’s ND program.

In the NUHS self-study report, it was noted that the above mission statement is currently in the process of being reviewed and revised, with the original goal of completing work on a revised mission in 2021. However, with the challenges presented by the Covid situation and turnover of several long-serving faculty members, this work has been delayed. Now that new faculty have been appointed and the institution has largely returned to normal operations, it is the program’s intent to complete work on a revised mission in 2022, including providing an opportunity to the program’s stakeholders to offer feedback on draft versions.

In 2016, NUHS adopted that following “Program Outcomes of Naturopathic Medicine” for the ND program:

1. *The naturopathic graduate will possess a thorough knowledge and comprehension of the biomedical sciences as they currently relate to diagnosis, treatment, and the determinants of health, along with lifelong learning skills to stay abreast of new and emerging developments in biomedical knowledge.*
2. *The naturopathic graduate will be proficient in the assessment of patient health status, diagnosis, referral, and case management of patients informed by appraisal of current evidence and application of naturopathic principles.*
3. *The naturopathic graduate will be skilled in creating treatment plans that address the determinants of health, follow a therapeutic hierarchy/order, are informed by evidence, and are congruent with naturopathic principles.*
4. *The naturopathic graduate will be ethical, compassionate, and professional in interactions with patients.*
5. *The naturopathic graduate will be proficient in working within the contemporary health care milieu, including working within health systems and integrative settings, and will be able to gather essential information about and adhere to local, state and federal regulations.*

The program outcomes are consistent with the mission and provide appropriate broad direction for the ND program. The program is considering potentially adding an outcome related to research, and the program intends to initiate a review of the program outcomes starting in later 2022 or 2023. This timing seems appropriate, since once the review of the program mission is completed, it will be useful for the program to review the outcomes to make sure that they are still consistent with the program mission and appropriate to the program, especially since the program curriculum has been revised since 2016.

As a multipurpose institution offering graduate-level training in various medical/healthcare-related fields, NUHS has adopted an institutional mission, which reads:

*The mission of National University of Health Sciences is to provide and promote the necessary leadership, cultural diversity, management, and resources for the advancement of education, new knowledge, outreach, and the ethical practice of the healing arts and sciences as taught within the programs of this University.*

The institutional mission is reviewed annually by the Board of Trustees, and there is a strong commitment on the part of the board, the president and the leadership team to align the institution's strategic plan, initiatives and activities with the mission to ensure institutional cohesiveness. The ND program mission is consistent with the institutional mission.

## **B. Development, Implementation and Review of the Mission and Outcomes**

As noted above, the program mission is currently in the process of being reviewed and revised, with a goal of adopting a revised mission in 2022. Also, there are plans to review the program outcomes, starting in later 2022 or 2023. It is unclear how extensively stakeholder input was solicited when the current program mission and outcomes were developed. Now that the NUHS ND program is well-established, it is important to provide opportunities for stakeholder feedback when reviewing and revising the mission and outcomes in the future.

The mission and outcomes are appropriately published in the NUHS Bulletin, which serves as the university's catalog. Additionally, specific program outcomes appear in specific course syllabuses based on whether the outcome is relevant to the course, which indicates that the mission and outcomes serve as the basis for the program. Students are generally supportive of how the ND curriculum is designed, which tacitly implies their support for the ND program mission and outcomes.

**Commendation I-1:** The university has a strong commitment to aligning its programs and activities with the university mission and has developed a strategic planning process promotes this alignment.

**Area of Interest I-1:** The program needs to review its programmatic mission in light of its revised curriculum, including providing opportunities for stakeholder input. (Std.I.B.1)

**Determination:** *Standard I on Program Mission and Outcomes is being met.*

## **STANDARD II: ORGANIZATION, GOVERNANCE AND ADMINISTRATION**

### **A. Legal Organization and Governance**

National University of Health Sciences is a not for profit, 501(c)(3) tax exempt institution that operates under an Illinois charter granted in 1941. NUHS has been accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools since 1981. The Doctor of Naturopathic Medicine program achieved candidacy status with the Council of Naturopathic Medical Education in March 2008 and was granted initial accreditation status in 2012 for a 4-year period. In October 2016, CNME reaccredited the ND program for a period of six years.

NUHS is governed by a Board of Trustees consisting of a minimum of nine members and a maximum of 12 members. The members of the Board are nominated and elected by the current members of the Board in accordance with Board bylaws and policies. Members may serve up to three consecutive three-year terms and serve on a volunteer, uncompensated basis. Currently, there are 9 Board members whose credentials include the following degrees: PhD, DC, MBA, EdD, MLIS and ND. There are currently one licensed ND member, three public members and five DC members. The Board meets semi-annually and appears to be a stable and functioning governance group; they voice strong support for the President.

There is a Code of Conduct for corporate officers and trustees that includes a provision requiring board members to disclose any conflicts of interest, and board members sign a statement affirming that they will abide by the Code of Conduct. While this provides protection against board members engaging in matters with which they have a conflict of interest, the team **suggests** that the board consider requiring individual board members to affirmatively disclose on an annual basis—on a form developed for that purpose—any specific conflicts on interest they may have.

The Board of Trustees establishes and monitors compliance with the institution's overall policies; elects new trustees; and approves the University Long Range Plan, budgets, changes in tuition and fees, and major purchases. It is also ultimately responsible for institutional fundraising, a responsibility it has delegated to the President. The Board hires and evaluates the President, and delegates administrative authority to the office of the President; the President, in turn, is responsible for overseeing the hiring of faculty and staff, and for delegating administrative authority as he considers necessary.

## **B. Administration**

The President is the chief executive officer of the University, and the current President has been in office since 2013. He oversees all University activities and responsible for all its facilities. The President is providing vision and leadership both personally and through the delegation of duties to the administrative staff.

The President's management approach is one of policy-based consultative decision-making, with the final authority for decisions resting with either the President or individuals who have been delegated specific decision-making authority. The Executive Group consists of the President, the Vice President for Administrative Services (VPADS), the Vice President for Business Services (VPBS) and the Vice President for Academic Services (VPAS). This group meets weekly and follows a set agenda. Decision-making at NUHS tends to be somewhat centralized.

The VPAS is responsible for overseeing all academic programs and clinical services. Reporting to the VPAS are the Academic Deans, Dean of Clinics, Dean of Institutional Effectiveness, Research Dean, and Registrar. The Assistant Deans, including the Assistant Dean of Naturopathic Medicine, report to the Dean of the College of Professional Studies – Illinois; they are two administrative levels below the President.

The chief academic officer of the Naturopathic Medicine Program is the Assistant Dean for Naturopathic Medicine (ADNM), whose primary responsibilities are: to ensure that the structure, content and delivery of the program achieve its programmatic outcomes such as programmatic assessment, curriculum management and improvements; hiring recommendations for part-time faculty; and various institutional committee involvement. The ADNM has 24 years of experience in naturopathic educational delivery and 21 years of experience in naturopathic education administration. The ADNM reports to the Dean of the College of Professional Studies – Illinois, who has oversight of all professional programs at NUHS; this administrative structure helps to ensure that resource allocation among all the professional programs is approached fairly.

The Leadership Team for the naturopathic medical program comprises the ADNM, the Dean of the College of Professional Studies - Illinois, and the Department Chairs (Basic Sciences – Illinois, Clinical Sciences – Illinois, and Clinical Practice). The ADNM regularly communicates with Leadership Team members and relevant faculty, and is considered to have programmatic authority and autonomy over matters directly related to naturopathic medical education. The ADNM represents the ND program as a participant in several standing committees of the University, such as Curriculum, Assessment, Admissions, Clinical Quality Management, Residency, and Rank and Promotion.

The ND program is at the same level as the other first professional degree programs. The Dean of the College of Professional Studies – Illinois initiates request for resources, but the ADNMM will also meet with the Executive team on matters that impact the ND program. The team believes that the naturopathic program has consistent and equal input into the strategic planning of the institution through the regular review and revision of budget statements and participation in department and administrative meetings.

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

### **STANDARD III: PLANNING AND FINANCIAL RESOURCES**

#### **A. Planning**

The NUHS has a board approved Long Range Plan (“LRP”) dated 2022 developed by various constituencies of the University. The LRP is broken down into four major areas of emphasis or “Pillars” that support the mission of the institution. The pillars are Students, Employees, University and Community. Under each pillar there are “themes” that are further broken down into AROs, under which there are a collection of objectives that focuses on action steps. Each action step has an “owner” who is/are responsible for an action step, and is linked to a key performance indicator (“KPI”), which are data point(s) collected to measure indicators of success. Many action steps have an estimated budget cost assigned. In many cases, the assigned budget cost is an estimate of personnel time to complete the action step; it is not an added cost or increase in expense.

Since the LRP is relatively new, there were no assessment of outcomes at the time of the visit. Many of the outcomes are expected in the later part of 2022 and into 2023.

Within the LRP, under the student pillar, are several specific goals related to the ND program with a theme of fostering or increasing student success. The goals for the ND program are assigned to the Assistant Dean for Naturopathic Medicine.

The University’s management structure is such that annual budgets are developed in consultation with the various departments affected. Regarding the ND program, the ADNMM receives a spreadsheet in which he enters revenue and expense projections for the next fiscal year. Some of the projections for the ND program come from the admissions department based upon the number of applications. It is up to the ND program to initiate budgetary requests for additional programs or faculty as the need arises. While the ADNMM is involved in the budgetary process, he does not have authority over the finances of the ND program in a number of areas. For example, authority for setting salaries for faculty is centralized.

#### **B. Institutional Financial Resources**

The team was provided with the audited 2021 & 2020 financial statements, the institutional budget for the current fiscal year ending Aug. 31, 2022, and a two-year operating budget forecast. In addition, the team was provided with a three-year budget projection for the Naturopathic Program for the same period.

The Institution's financial statements are audited by Sikich LLP, an independent CPA firm. The auditor expressed an unqualified opinion of the financial statements as of and for the year ended August 31, 2021, and 2020.

Based on the 2021 audited financial statements of NUHS, the institution has nearly \$57 million in total assets which includes \$16.6 million in investments not donor restricted; \$9.6 million in investments restricted by purpose and time (approximately \$5.7 million) or in perpetuity (approximately \$3.9 million); \$5.3 million in cash; and \$22.8 million in net property and equipment. Liabilities totaled \$7.7 million which consist of \$5.1 million in term and bonds payable. Total Net Assets were \$49.2 million of which \$39.6 million are without donor restrictions. From a financial position standpoint, NUHS is financially sound. Its two balance sheet ratios, Primary Reserve and Viability, are and have been strong.

Operationally, NUHS is projecting a deficit (decrease in net assets from operating activities) for the current fiscal year and in the next two fiscal years. For the current fiscal year, the board approved budget reflects a \$1.9 million deficit. Since the institution tends to budget conservatively, the CFO anticipates the year will end with approximately an \$800,000 deficit. For fiscal years 2023 and 2024, the operating forecast presented to the team reflects a \$600,000 and \$464,000 operating deficit, respectively. The CFO believes the deficits will also likely be lower than forecast for these fiscal years. Over the last couple fiscal years, there were no salary increases for faculty and staff due to financial constraints, though prior to that there were salary increases in the 2% - 3% range; however, bonuses were given in lieu of salary increases. No decision has been made on either a salary increase or bonuses for the current fiscal year. In addition, the institution's contribution to the defined contribution retirement plan has been reduced from 4% to 2% of base salary. It should be noted that bonuses are not included in base salary for institution contribution to the retirement plan.

The institution presented the operating budget for the ND program for fiscal 2022. The excess revenue over expenses is expected to be approximately \$2.1 million. This excess includes allocated institutional costs for maintenance, IT, and academic facility costs. This is a healthy margin that contributes to the overall operations of the institution.

**Area of Interest III-1.** Given the current and projected operating deficits, the institution must continue to adequately fund the program to ensure its that administrative and faculty staffing needs—and other needs—are met. (Std.III.C.1)

**Determination: Standard III on Planning and Financial Resources is being met.**

## **STANDARD IV: PROGRAM FACULTY**

### **A. Faculty Qualifications**

NUHS has a well-qualified and cohesive faculty team in both the clinical and didactic areas of the ND program. All faculty have terminal degrees in appropriate fields (including ND, DC, MD, PhD, EdD and master of anatomy degrees), and clinical faculty have at least 2 years of clinical experience. Clinical faculty and didactic faculty in the program with the ND credential have

tended not to overlap; however, the program is looking to change this by having clinicians take on some teaching responsibilities, and having ND didactic faculty take on some clinic shifts, to promote greater continuity for students as they progress through the program. Creating a greater degree of overlap was identified as a way of improving the program in the Action Plan that resulted from the 2021 self-study process. It was the team's impression that the faculty are highly committed to their students and to the ND program.

There is currently no regulation of naturopathic physicians in Illinois; however, most of the naturopathic program clinic faculty are dual DC-ND graduates and hold a DC license in the state, which allows them to sign off on patient charts. NDs who do not have the DC credential all have a license from a licensed jurisdiction.

Faculty files are appropriately maintained and up to date.

## **B. Faculty Sufficiency**

Generally speaking, the ND program has had sufficient faculty to meet its needs, though it seems that some of the clinical faculty are stretched given their multiple responsibilities. Over the last couple of years there was a fairly sizeable turnover of experienced faculty that created challenges in terms of finding appropriately credentialed and experienced faculty to cover some of the courses; however, it appears that these faculty positions have now been filled. That said, the administration should, if it hasn't already, look into the reasons why so many faculty left and how that situation was dealt with. Some faculty expressed concerns that they are being asked to teach new courses with little notice that are sometimes outside of their field of expertise. This can lead to burn out and might possibly impact faculty retention in the future.

NUHS has a 10-trimester program, with 3 intakes per year. As such, faculty generally teach the same course 3 times a year as each group progresses to the next trimester. Previously, NUHS considered a full-time teaching load to be 12 – 15 hours. The team heard from faculty that this arrangement (i.e., allowing for a range of hours) was changed recently, and now a full-time contract is set at the upper end of the range, namely 15 hours. This has resulted either in a decrease in compensation for some faculty who earned additional income at NUHS by teaching a course in a different program or in an increase in the teaching load.

In addition to their teaching responsibilities, each faculty member is also assigned a list of students for whom they are expected to act as an advisor. Some faculty are uncomfortable with this role, since they feel they lack sufficient familiarity with the program curriculum to be able to effectively advise students. There appears to be only modest involvement of the program faculty in research/scholarship at this time, which is probably due to their heavy teaching load and other more immediate institutional responsibilities.

In the past, faculty have also been involved in various state and national organizations promoting the profession. Likely due in part to the limitations on travel and in-person gathering implemented in response to the Covid situation, NUHS's ND faculty presence on these external organizations is minimal at this time.

## **C. Faculty Orientation and Performance Evaluation**

Faculty orientation is provided online. Some faculty expressed that the orientation of new members is inconsistent. The team heard that non-ND recent hires were not provided an orientation to Naturopathic Medicine, as required by under CNME Std. IV, and received little in the way of orientation to duties outside of teaching. Administration should ensure that all faculty teaching in the ND program have a solid orientation to the university, and that any non-ND faculty are well oriented to the field of naturopathic medicine.

There is an annual evaluation for both full- and part-time faculty, beginning with a self-evaluation component that also includes consideration of their scholarly and service contributions. The self-evaluation is then reviewed by the appropriate department chair, who compares it to their own observations and information. If teaching remediation is required in certain areas, mentorship and/or course audits may be employed, providing constructive feedback. There is also a mandatory requirement for continuing education in pedagogy, which can be met through consultation with the Instructional Designer on staff. Faculty are encouraged to make better use of this resource.

Some students expressed concern that, as both department chairs are new to their position, they may not yet be fully aware of some faculty performance issues that may need to be addressed. One concern is that some faculty seem not to have updated their teaching material in many years, particularly with respect to online learning, and that there is considerable duplication of material by some instructors.

#### **D. Faculty Professional Development**

NUHS offers ongoing, free, faculty development seminars, and provides links to webinars and articles via the Faculty Development Page on Cygnet, the LMS. The standing committee on Faculty and Staff Development that plans and stages development-oriented events for faculty, and faculty are given a small amount of professional development funds as part of their annual contract—and may request additional support from the department chair for specific programs and activities. There does however appear to be an inconsistent understanding among the faculty about what continuing education supports are available and how to access them, and the administration could, perhaps, be more proactive in promoting faculty to avail themselves of these continuing education benefits. As noted above, some students were concerned about some faculty members still utilizing outdated, less-effective teaching methods such as reading from PowerPoint presentations. NUHS should be commended for supporting some of their faculty to attain terminal degrees while continuing as full-time employees.

#### **E. Faculty Participation in Program Development and Academic Administration**

The model of shared governance at NUHS appears to be generally be based on a consultative model, where faculty are asked to provide suggestions and feedback on changes to policies and curriculum. There are a number of committees, including a faculty senate, in place to involve faculty with governance, and ND program faculty are well represented on these bodies. Some faculty stated that they felt they were assigned tasks to be involved in, but had little say in final outcomes. Once a new or revised policy is implemented that impacts faculty, faculty have an opportunity to comment on how the changes are affecting them, including if there are any

negative or unintended consequences. It may be more efficient use of time on all levels if faculty can be consulted more consistently on draft policies that affect them before they are implemented. Some faculty also mentioned that a number of committee meetings are continuing to be conducted online instead of in person, despite faculty and students largely returning to campus; while this has logistical advantages, it is perhaps at the expense of the collegiality that comes from in-person gatherings.

Faculty in general hold the ND Program in very high regard. They feel that the academic requirements are stringent and produce highly educated and qualified professionals.

## **F. Conditions of Faculty Employment**

The institution publishes a Faculty Handbook that includes information and policies in compliance with CNME standards. Faculty expressed concerns regarding compensation, advising that there had only been one pay increase in the past 5 years. As mentioned in the 2016 Evaluation Team Report, there is concern that unclear or inconsistent communication with respect to pay expectations and requirements can lead to poor morale and an inability to attract qualified and experienced faculty. A potential example of this is seen in the clinic faculty where most, if not all, supervising clinicians are NUHS graduates. The faculty salary level may make it difficult on occasion to recruit qualified and experienced faculty.

**Commendation IV-1:** The team commends the faculty involved in all aspects of the ND program for their expertise, as well as their commitment, collaboration, and resilience in the face of daunting challenges over the last couple of years.

**Area of Interest IV-1:** A number of faculty said that they have been asked to teach new courses without sufficient lead time to prepare and also occasionally in subject areas outside of their expertise. While the team realizes this may sometimes be necessary, the program should examine this situation to determine whether there may be a substantive issue (e.g., insufficiency of faculty in certain subject areas) that needs to be addressed, especially since such situations may erode faculty morale and lead to burnout. (Std.IV.B.1)

**Area of Interest IV-2:** Orientation of new faculty who teach in the ND program appears to be carried out inconsistently. This issue, which has been identified as part of the Action Plan arising from the 2021 self-study process, needs to be addressed. (Std.IV.C.1)

**Area of Interest IV-3:** The program should take steps to ensure that non-ND faculty are introduced to naturopathic medicine early in their tenure so that these faculty members understand the academic needs of the ND students they teach. (Std.IV.C.1)

**Area of Interest IV-4:** To the degree that faculty may be using less effective and outmoded pedagogical practices for course delivery—especially in the context of online courses—faculty should be encouraged to make use of the Instructional Design staff and other resources on pedagogy that NUHS provides to faculty as part of its faculty development resources. (Std.IV.D.2)

**Area of Interest IV-5:** The model of shared governance at NUHS is generally consultative where faculty are welcome to provide suggestions and are asked for feedback on changes to policies and curriculum. There are a number of committees, including a faculty senate, in place to facilitate this approach to governance. However, it seems that some of these structures are currently not fully operational. The program and institution should review how faculty governance is currently operating to determine whether its operations are consistent with how it is structured. (Std.IV.E.1)

**Area of Interest IV-6:** Faculty pay has remained constant since 2016, with the only increase in remuneration being in the form of an occasional bonus; this appears to have had adverse impact on faculty morale and may be an impediment to timely recruitment to fill faculty positions. (Std. IV.F.3)

**Determination: Standard IV on Program Faculty is being met.**

## **STANDARD V: STUDENT SERVICES**

### **A. General Provisions**

NUHS offers the full range of student services required under CNME Standard V: admissions, orientation, advisement and academic counseling, financial aid, tutorial services, and career development services.

The various student services fall under two departments within NUHS: the Vice President for Administrative Services and Director of Alumni & Development (who reports to the President) oversees the Dean of Students and the Director of the Learning Resource Center; and the Vice President for Business Services and Director of Management Information Services (who also reports to the President) oversees the Director of Communication and Enrollment Services, and the Director of Financial Aid. The administrative leadership involved with student services are experienced in—and appropriately qualified for—their roles, and they work well together as a team.

Because a new class is enrolled every trimester, student services provides a new student orientation course each trimester that new students are required to complete. The orientation is provided online through “Cygnet”, which is NUHS’s online learning management system; the orientation includes information on such topics as academic advising, the registrar, and financial aid, among others. Staff are also readily available to assist new students individually in getting oriented. In the past there were also some in-person orientation activities, but these were discontinued due to governmental constraints in response to the Covid situation; it may be good to consider whether some in-person activities would be worth resuming.

NUHS’s primary publication regarding academic programs, policies and services is the NUHS Bulletin, which is made available online and updated annually. Academic policies in the Bulletin cover such topics as grading, advanced standing, leave of absence, etc. The Bulletin also contains information on the various professional programs and tuition fees, an academic calendar

covering a 3-year period, resources available to students, crime statistics and general information on a wide range of areas.

NUHS also publishes a comprehensive Student Handbook that also describes student services, activities, rights, privileges, and responsibilities, as well as policies and procedures governing the wide range of topics, including: disciplinary procedures, complaints, the student council, Campus Crime and Security Report, sexual harassment policy, sexual assault policy, anti-hazing policy, policy on drug testing, and the policy on technical standards for admissions. As a condition of enrollment in NUHS, all students agree to abide by the Student Code of Conduct, as well as the policies published in the NUHS Bulletin, Student Handbook, and other official University publications. Student organizations are similarly obligated to follow applicable rules and policies. The purpose of the NUHS Student Code of Conduct is to affirm the importance of appropriate professional behavior on the part of all NUHS students and student organizations, and to establish and maintain guidelines for dealing with inappropriate behavior and misconduct.

The NUHS Student Council provides a good forum for student input into matters that affect the student body. All University students are welcome to attend Student Council meetings and events, and Student Council officers serve as voting members on some standing committees within the university, including the University Council, which includes Vice Presidents, deans, directors, faculty senate chair. This level of student representation provides students the opportunity to regularly provide formal input to the administration.

Students are given an opportunity to provide confidential feedback about course satisfaction via a link that they receive for each course, and they are also welcome to meet with Department Chairs, the Assistant Dean of Naturopathic Medicine, and the Dean of the College of Professional Studies. The Assistant Dean hosts an Open Forum at least once per trimester, where students can provide feedback, ask questions, and hear about program updates.

NUHS provides effective avenues for both academic complaints, which are often resolved at the department chair level, as well as for non-academic grievances such as discrimination, harassment, and other complaints, which are handled by student services.

NUHS has been effective in maintaining campus safety. Security guards patrol of the main campus 24 hours a day; seven days a week, and campus security is available by cell phone. Students may request an escort from one point on campus to another. The campus is located in one of the safer areas within the greater Chicago region, and is set back from the main road and is well-lit.

Overall, students that the team met with expressed satisfaction with the student services provided by NUHS.

## **B. Admissions**

NUHS has adopted appropriate admissions requirements for the ND programs and adheres to them closely. The following are the requirements:

The ND program admits students who possess academic and personal attributes consistent with the program's mission, and who have completed a BS degree at an institution(s) accredited by an agency recognized by the U.S. Department of Education or an equivalent foreign agency. The GPA is calculated on the best 90 semester hours which is not less than 3.0 on a 4.0 scale. The best 90 semester hours will include a minimum of 24 semester hours in life and physical science courses appropriate as undergraduate preparation for naturopathic medical education.

Students are expected to have completed a total of 24 credit hours in life and physical science coursework before entering the chiropractic or naturopathic programs. The 24 credits of life and physical science coursework should include both lecture and laboratory components in each of the following areas:

- Biology
- Physics
- General Chemistry
- Organic Chemistry
- Additional coursework is recommended, but not required for admission:
  - Anatomy (human or comparative)
  - Biochemistry

All courses must be taken at an accredited institution and must be transferable at the baccalaureate level. All courses must be completed with a “C” grade (2.00 on a 4.00 scale) or higher. A grade of “C-” is not satisfactory unless it is equivalent to a 2.00 on a 4.00 scale.

Additionally, applicants must complete a 3-part essay and be able to meet the program’s technical standards.

The admissions process is overseen by the Director of Communication and Enrollment Services under whom there are admissions staff. Additionally, there is an Admissions Committee that assists in aspects of the admissions process made up of deans, assistant deans for the various programs, directors and faculty.

The NUHS admission process does not routinely include formal interviews by faculty or other academic personnel; instead, each applicant has an informal interview with their admission counselor, where the candidate’s ability to communicate, understanding of the program, professional goals, etc., are assessed. The interview is documented in writing and housed in the applicant’s physical file, which is made available for Admission Committee review. If additional information is required to make an admissions decision, the Admissions Committee may require a phone or an in-person interview with an applicant. The Assistant Dean for Naturopathic Medicine is closely involved with the admissions process: he is regularly in touch with the admissions department, and serves on the Admissions Committee and reviews reports on applicants.

While the Admissions Committee does not meet to review every applicant, it does review applicants who present situations that may be problematic (e.g., a past felony charge that is not

fully explained). And any member of the Admissions Committee may call for a meeting of the committee before an admissions decision is made. The Assistant Dean has a mandatory advising meeting with every single admitted student to the ND program in order to ascertain what credit load it best for them and address any other matters; this helps to facilitate the transition from applicant to enrolled student.

The admissions process adheres to various external requirements, such as those pertaining to tuition refunds. A lot of effort goes into ensuring that admissions-type publications, such as the NUHS Bulletin, are up-to-date and accurate, and generally it appears that every effort is made to conduct admissions activities honestly and ethically.

### **C. Student Records**

At NUHS, student files consist of:

- Application for Admission
- Letter of Acceptance
- Two Character References
- Copy of Payment and receipt for tuition deposit
- Official transcripts from previous institutions attended
- Forms that change student academic record and student data requests such as: grade changes, manual Add/Drop forms, Legal Name Changes, Manual Registration forms, Personal Data Forms, Acknowledgement Form, Withdrawal Requests.

The Admissions Office maintains records of applicants. Once an applicant is accepted, the admissions records are transferred to the Office of the Registrar, which maintains records of current students and graduates. The Office of the Registrar adheres to the guidelines set forth by the American Association of Collegiate Registrars and Admissions Officers (AACRAO). The official student records of students who are active or have been active in the last 2 years are maintained and stored in secure fire-resistant cabinets located in the Office of the Registrar. Students who have been withdrawn or graduated more than 2 years ago are stored electronically, indefinitely, on the university servers. Electronic files are backed up daily.

To ensure the right-to-privacy, the Office of the Registrar follows the standards and guidelines of the Family Educational Rights and Privacy Act of 1974 (FERPA). The FERPA policies are posted on the NUHS website, student/faculty portal, student handbook, and the University Bulletin. Students may inspect and review their Education Records upon a written request to the University Registrar. The University Registrar will make the needed arrangements for access as promptly as possible and notify the student of the time when the Education Records may be inspected.

If National University of Health Sciences closes, it is the Registrar's responsibility to make sure that student records are moved to a location available to former students, and that the student are properly notified of that location and the procedure necessary to obtain official transcripts as needed.

National University of Health Sciences utilizes a Student Information System called Comprehensive Academic Management System (CAMS) under the direct supervision of the Registrar. As the hub for academic data, the system allows the university to accurately enter student information, enter grades, and generate academic transcripts and enrollment forms. The system also has an online requisition platform which allows students to self-register for courses. In addition, via the Degree Audit feature, CAMS system provides students with information on their required path towards graduation. It provides a shared view of student progress by administrators, faculty, and advisors.

From a review of student records and conversations with student services staff, it is evident that student records are carefully maintained in accordance with NUHS policies.

#### **D. Tuition and Financial Aid**

The Financial Aid Department consists of a full-time director, full-time assistant director, full-time generalist, and part-time receptionist. Staff are appropriately qualified, and the department is sufficiently staffed to meet the needs of the students. Staff are available throughout the day to assist students either in-person or on the phone to answer questions about aid eligibility, loan repayment, and any other questions they may have. The staff participate periodically in financial aid trainings to remain up-to-date on federal regulations and to be able to provide students with accurate information about their options.

All incoming students who obtain federal loans are required to go through online entrance counseling through the federal government direct loans website. In addition, all incoming students attend a financial aid session as part of the formal orientation process, where loan amounts, responsibility to repay loans, budgeting, living allowance, resources and so forth, are reviewed.

NUHS informs students annually about obtaining a free credit report, and provides information on non-institutional scholarship opportunities that the financial aid office becomes aware of. Each trimester, students are informed of scholarships available from endowed funds created to award eligible students.

In their last trimester of enrollment, graduating students attend a pre-exit counseling session as well as a formal exit counseling session just prior to graduation. The pre-exit is done approximately 1 month prior to graduation and the purpose is to review their loan debt and review loan repayment strategies. This is in preparation for the formal exit session at the end of that trimester. Providing in-person exit counseling is an important function of financial aid as students are continuing to borrow significant loan amounts, and the exit counseling sessions provide a forum to ask loan repayment questions. This is to supplement the Direct Loan Exit Counseling tool and appears to serve our students well.

NUHS has contracted with Inceptia, a nonprofit organization, to reach out to graduates of NUHS's professional programs approximately 3 months after graduation to review loan repayment issues and answer questions about loan repayment. This service has contributed to NUHS's low student loan default rate.

## **E. Counseling**

ND students are assigned to individual faculty members who serve as academic advisors, and students are required to meet with their faculty advisor at least once a term. Additionally, department chairs and the Assistant Dean for Naturopathic Medicine are also available to provide advice. All these various advisors can enter a confidential note into a student's record, tracking the history of issues and actions taken or advice given; this process allows for an early warning if a student is potentially at academic risk. Using faculty as academic advisors is not an ideal system, as the faculty at NUHS are very busy with their other responsibilities and vary in their understanding of their advisory role and ability to carry it out.

The University has developed policies to address the needs of at-risk students. Students are informed in writing if they are at risk and must see a Department Chair for advising prior to registering for further courses. Any student who receives an F or whose term GPA drops below 2.0 receives an academic warning. A student whose cumulative GPA drops below 2.0 is considered on probationary status. A student who receives three probationary terms are suspended from the University; in this case, they must attend a meeting of the Academic Standards and Grade Review committee, which reviews their progress and hears the student's case. This usually results in the upholding of the suspension, but sometimes leads to permanent separation from the University.

As a complement to the more formal advisory system, the university is piloting a student mentorship program whereby first-trimester students are paired with more senior students, who provide support and guidance aimed at helping mentees successfully complete their first trimester.

Regarding personal/psychological counseling, NUHS provides referrals to independent counselors not affiliated with the University's clinical services. These external counselling sessions are confidential and no records are shared with NUHS personnel.

The Office of Student Services provides peer-to-peer tutoring services at no charge to students. These services are provided online or in-person by selected students who are more advanced in the program who have the academic ability to assist fellow students.

The Office of Alumni and Development provides career counseling, networking opportunities, and placement services for current students and alumni through regular communication and networking opportunities. This department is piloting a system that would allow students to utilize online "mock interview" software that helps students be better prepared for future job interviews. This department also sets up opportunities for alumni volunteers to meet online or in person with students to discuss career topics such as clinical practice development, marketing, licensure requirements, and job markets. Regular emails are sent to both students and recent graduates regarding possible new career opportunities and open practice positions, and opportunities are also posted on the NUHS website. The program expressed that it would like to find other ways to support graduates' career development.

## **F. Use of Information and Communication Technology**

The University uses a Moodle platform as its learning management system known as “Cygnet”, which is a reference to the university’s long history of keeping breeding Swans on the campus pond. Each student and faculty member has a login for Cygnet. Faculty members can see the entire activity log, including how often each student has been to the site, if they opened a specific file, and when they took a quiz. While the ND program is mostly residential, some courses are offered mostly online—and during the Covid situation all lectures were offered online. Generally, online courses employ a mix of synchronous and asynchronous learning.

The ND program is in the process of reviewing each course of the curriculum as part of what is referred to as the Course Progress Review; as part of this review process, the Assistant Dean and the Instructional Designer have been reviewing the Cygnet page for various course with the goal of providing feedback/suggestions for both immediate and longer-term improvements, and sometimes immediate improvements must be made. These are shared with the Dean of Professional Studies and the relevant Department Chair, as well as the faculty member who teaches the course in question.

In the Spring of 2020, NUHS contracted with Proctorio, an online exam security service, to monitor tests – which range from quizzes to final examinations. Initially, this was used for at home exams; however, it is now starting to be also be used for in-class examinations. The features of Proctorio include recording of the student’s screen; audio-recording; webcam recording; a 360-degree recording of the room at the beginning, ending, or at intervals of the exam; limiting the student’s device to one screen at a time; blocking downloads; and flagging suspicious behavior.

Any automatically generated “suspicious” behavior is not held against the student, since the software is not 100% accurate. A faculty member must view and analyze any such flagged behavior and, even then, they may consult with their Department Chair and possibly student services and the Dean of Professional Studies.

## **G. Official Publications and Online Resources**

As noted above the NUHS Bulletin serves as the university’s program catalog. It is updated annually and a new edition is electronically published in the late summer and made available on the NUHS website, where it is available for download. Additionally, the university publishes brochures about the program, as well as a Student Handbook. It appears that the admissions department makes sure that marketing materials are thoroughly vetted with the academic administration and faculty. The Assistant Dean of Naturopathic Medicine, in particular, is asked to review the accuracy of brochures and web pages that go into detail about curriculum and to provide training to the admissions and marketing team. The Director of Marketing, Communications, and Admissions has been a member of the AANMC marketing subcommittee for many years. From a review of NUHS’s marketing- and student-oriented publications, all of the information that CNME requires programs to make available to applicants and students is included in the university’s publications.

The ND program's accredited status with the Council on Naturopathic Medical Education, including contact information for the CNME, is appropriately published in the Bulletin and on the NUHS website.

**Commendation V-1:** The team commends the professionalism and organization of the Student Services Dept.

**Determination:** *Standard V on Student Services is being met.*

## **STANDARD VI: PROGRAM OF STUDY**

### **A. Program Development, Delivery, and Integration**

As part of its course progress review process, the NUHS Curriculum Committee has developed successful systems for organizing the curriculum, with clear programmatic outcomes, and standardization of syllabi and Learning Management System (LMS) course pages. Faculty have been supported in updating their material with the help of software and an instructional designer. The committee is at the beginning of matching assessments back to learning and programmatic outcomes to determine competency. The curriculum is thoughtfully designed with clinical application building on basic sciences.

Curriculum was recently revised (January 2022) based on the feedback of needing more naturopathic philosophy and therapeutic modalities, especially botanical medicine and homeopathy delivered earlier in the term. An NPLEX prep class was added to assist students in study skills and test taking strategies. We suggest reviewing the changes after a few trimesters to ensure the depth and breadth of the courses are meeting the intended goals for the change.

We received a mix of reports on the delivery of class material with some faculty eager to integrate new technology and utilize an iterative approach to course revisions with the consideration of student feedback, while other faculty were reported to be more resistant to change and slow to innovate. Student concerns focused on online material not being kept current and the perceived irrelevance of certain classes required of ND students. These include business classes with a chiropractic focus and jurisprudence specific for a different profession or different state.

Overall, faculty is seen as approachable and available during office hours and between classes, ready to offer additional student support.

### **B. Academic Component**

The ND and DC programs share some courses in common. The integration of chiropractic and naturopathic tracks has many perceived advantages: students in each college learn to communicate and collaborate with one another and see their commonalities over their differences, and they also hold each other to a high standard in each other's 'specialty'. These advantages were recognized by both the faculty and students. By virtue of their shared courses, naturopathic students receive in-depth training in chiropractic manipulation in their first year and chiropractic students receive a thorough education on internal anatomy.

However, at around 4,900 clock hours, the ND program is quite long and well in excess of CNME requirements, while NPLEX scores are below average when compared to most of the other naturopathic colleges. As stated in the self-study, “the over-teaching of certain subjects” is “perceived as a liability”. Additionally, NUHS faculty report students in shared ND/DC courses as seen as being ‘checked out’ when they feel that the class is targeted to the other degree. The courses titled “Naturopathic Management of Special Populations”, “Introduction to Traditional World Medical Systems” and “Foundations of Naturopathic Medicine” address to some degree skills associated with the nuances of treating diverse populations in regard to culture, religion, race, gender, sexual orientation or social class. The program should consider whether more coursework to support inclusive clinical training would benefit the students. Additionally, the team did not see any ND course listed in the NUHS bulletin that mentions ethics explicitly. Practicing with a strong sense of ethics is a cornerstone to medical practice and a CNME standard; the program should check to make sure that this area is adequately covered.

The Department of Institutional Effectiveness maintains a document titled “Assessment Record Overview” (ARO). The ARO is a document that tracks and reflects the action of the assessment process. It is kept and monitored by—and in the case of naturopathic medicine, authored and executed by—the Assistant Dean for Naturopathic Medicine. This process is useful in contributing to ongoing improvement of the ND curriculum.

### **C. Clinical Education Component**

The NUHS clinic education team has created many innovative ways to ensure clinical education is competency-based. The development of the T5 Clinical Evaluation and Diagnosis SIM class with standardized patients allows students a safe, formative place to practice clinical encounters, receive feedback and the opportunity to self-reflect on performance. The adoption of the ‘mini CEX’ allows for multiple, low-stakes opportunities for feedback from mentors on actual patient encounters.

The team did have a concern around the grading of the Mini CEX. In the scenario that a student scores low on an assessment, they do not appear to have the ability to easily remediate their grade without scoring substantially higher than the average. Both faculty and students confirm that it is extremely rare to score above average on a Mini CEX, but it is not rare to score below average. The team suggests a review of this assessment grading with the possibility to drop the lowest score if the school finds this to be a credible concern.

### **D. Clinic Administration, Resources and Facilities**

Currently, with the COVID accommodations of simulated patients, the NUHS teaching clinic has sufficient patient contacts for students to meet their graduation requirement. Often, students complete their requirements early and have opportunity to seek outside mentorships with clinicians in private practice. These sites offer training in-addition-to the minimum graduation requirements, and supervisors must sign off before a student is permitted to receive this additional training.

Students are taught SOAP note style patient charting and maintain charts using Electronic Medical Records. Records are kept secure and are signed by supervisors who have dual ND-DC licensure as per the state requirement.

Patient follow up and consistent mentoring is built into the NUHS ND clinical education model. With students assigned to the same clinician supervisor and following the same patients throughout their internships, clinicians can identify weaknesses and help students build on their strengths. Students observe success or failure of their treatment plans and adjust accordingly. The concern with this model is the lack of patient diversity. Furthermore, many of the patients that interns see are either students or family members of students—many of which do not have significant pathology and are utilizing the clinic for health maintenance. Students get practice with health basics with these patients, but without a more robust and diverse patient population students are not prepared for the diversity of conditions they will see after graduation as naturopathic practitioners. In past years, there were opportunities to intern at external sites within the community. The program should strongly consider returning to this model in order to remedy this concern. Stronger marketing efforts directed at the broader Lombard, Illinois, community to bring new patients into the clinic may also serve to diversify the patient population. Also, it would be helpful for the clinic administration to carefully review the differing training needs of DC, ND and acupuncture students, and to tailor marketing efforts accordingly so that the distinctive training needs of each program can be fully accommodated.

**Commendation VI-1:** The efforts underway to ensure consistency and accuracy in program materials such as syllabi, and to create ongoing systems and implementation of software that facilitates consistency going forward.

**Commendation VI-2:** The ‘Sim Lab’ in the 5th trimester using standardized patients provides an outstanding formative clinical experience.

**Recommendation VI-1:** The team is concerned that there is a lack of sufficient diversity in the patient conditions/pathologies and demographics/populations of the patients that students treat; this situation may be due to an overreliance on using students and student family members as patients, the current lack of external clinical sites, and insufficient teaching clinic marketing efforts. This lack of diversity needs to be remedied.

**Area of Interest VI-1:** The number of combined DC-ND courses taught by non-NDs and the amount of time that ND students devote to DC-ND courses may not be optimal in regard to the academic and training needs of ND students, which in turn may have a negative impact on NPLEX success and student satisfaction. The program should carefully review the shared courses to make sure that they reasonably meet the needs of the ND students.

**Determination:** *Standard VI on Program of Study is being met.*

## **STANDARD VII: ASSESSMENT OF STUDENT LEARNING AND PROGRAM EVALUATION**

### **A. Assessment of Student Learning**

Starting in 2018, the NUHS Assessment Committee began working to ensure each ND class has appropriate student learning outcomes corresponding to course description and class assignments. Evaluation of the weight and appropriateness of each assessment and mapping weekly learning plans to assessments is also currently underway. Beginning in 2022, the Assessment committee will begin the next phase of review, examining the correspondence of each course assessment to the ND program outcomes. Once complete, the analysis of assessments will help determine strengths and weaknesses within the curriculum on a more granular level.

A broad variety of student assessments are used throughout the curriculum and the recent implementation of the week 6 ‘early assessment’ will help catch struggling students earlier in the term. The standardization and continued maintenance of the on-line gradebook will serve to do the same. The implementation of the Mini CEX and the electronic clinical quantitative evaluation system is important for tracking student’s clinical success in real time.

One suggestion as students move to online, proctored assessments through LMS is to standardize and create policy to support online testing. This will serve to ensure students are being assessed on their knowledge of the material and not on their understanding of how to take the test.

## **B. Program Level Assessment and Evaluation**

NPLEX has served as the main point of programmatic assessment for the naturopathic program at NUHS and passing is a requirement for students wishing to be licensed as naturopathic physicians. For the past several years, NUHS’s passing rate has been below that of the naturopathic school average. NUHS has identified this as an opportunity for improvement and has taken steps to revise the curriculum with the goals of improving NPLEX scores. The accreditation team suggests following these scores as one metric of success for the curricular modifications and continue to adjust as needed.

While the number and variety of assessments give students feedback on their progress, NUHS is in the process of implementing a robust system for tracking how the program is performing to educate future naturopathic physicians. The Assessment Record Overview system reviews various assessments, recommends changes to the curriculum and sets benchmarks for the next cycle on a 5, 3, and 1-year review of the data. The main data used to determine the success of the program are NPLEX results.

While this data is objective and validated through a third-party it does not allow for the granular reflection needed to fully assess the success of the individual programmatic objectives taught throughout different classes in the program. NUHS has identified this as an opportunity for improvement and has begun the work of identifying and tracing additional assessments for analysis.

**Recommendation VII-1:** While the ND program engages in a range of assessment activities and processes related to both individual students and the program as a whole, the ND program has not codified its assessment activities into a comprehensive plan. Additionally, the program relies on only a few key assessment benchmarks. The program needs to develop and implement a

comprehensive assessment plan that sets forth benchmarks, timelines, processes and responsible individuals. (Std.VII.B.1)

**Area of interest VII-1:** NPLEX results have, in recent year, been relatively low; while the team understands that steps have been and are currently being taken to improve scores, the program needs to consistently monitor NPLEX results and continue to explore ways to help students improve their performance. (Std.VII.B.5)

***Determination:*** *Standard VII on Assessment of Student Learning and Program Evaluation is partially being met, with deficiencies noted.*

## **STANDARD VIII: RESEARCH AND SCHOLARSHIP**

As reported in the self-study narrative, NUHS has a strong commitment to research and scholarship and a prolific research department. Members of the Team met with the Research Director and Research Resident. The department is led by the Dean of Research, whose primary roles are to conduct research and support faculty in their research and scholarships projects. Additionally, the Dean pursues grants for conducting research, oversees the research committee to review proposals, and ensures Institutional Review Board (IRB) protocols are followed. The department manages the research funds being allocated for proposals submitted by both clinical and didactic faculty according to guidelines developed by the University.

The research residency is a 3-year position that helps a new graduate develop as an independent researcher. The resident teaches courses, pursues research projects and mentors students. The current resident earned degrees in both naturopathic and chiropractic medicine from NUHS. She is enrolled in a PhD program and aspires to become NUHS faculty.

Scholarship is integral to the educational process at NUHS. The curriculum includes a course in evidence-based healthcare that familiarizes students with how evidence is reviewed and accepted. Students must employ databases to complete assignments and reference scientific literature to support a position. This is reinforced throughout the curriculum. For instance, students are assigned to deliver one session of Grand Rounds. In preparation they must meet with the reference librarian and cannot present until meeting the standard for evidence to support their conclusions.

In spite of a heavy teaching load, faculty are encouraged to publish and conduct research for promotion in rank and achieving tenure. The annual review process includes a scholarly activity section. The University supports faculty in achieving their scholarship goals in a variety of ways. The Research Department formally mentors one faculty per year; including guidance on conducting case studies, pilot studies, case reports and educational research. Additionally, the department has sponsored faculty continuing medical education resulting in online videos and tutorials and new faculty training guides to research.

Twice a year the research department creates a scholarly activity report, a collection of all the faculty research and scholarship, that is shared with the President and Board of Trustees.

A review of NUHS' research over a three-year trend (2019-2021) indicates an increase in research and scholarly activities by ND faculty.

In addition to the Research Resident, a Research Fellow is available to mentor students engaged in research activities. Depending upon funding, the department hires 2-3 fellows among the ND and DC student population. Although the positions are competitive, the Research Dean assured the Team that all interested ND students are able to get positions and support to achieve research goals. Recently, the Research Resident and Fellow created an ND Student research club, which focuses on peer review, applying research findings to clinical practice, writing case reports and collaboration for publications such as NDNR.

Since the 2016 CNME accreditation site visit, and in spite of the interruptions in their progress due to the pandemic-related mandates, the program has taken efforts to expand research opportunities in the area of naturopathic medicine for students and faculty.

**Commendation VIII-1:** The research department has taken a number of steps to increase the amount of naturopathic medicine-related research activities and to more extensively involve ND students in research.

**Determination: Standard VIII on Research and Scholarship is being met.**

## **STANDARD IX: LIBRARY AND LEARNING RESOURCES**

The library is a bright and welcoming facility staffed by highly qualified, committed individuals. The entry and circulation desk divide the building into two parts; the stacks with a quieter work area, and the group work area where there is also an Anatomage table for gross anatomy study. Resources also include plastic skeletons and organs. While the pandemic and online learning has resulted in fewer people using the physical space, students, faculty, and staff are encouraged to come in person again. New study carrels have recently been installed, adding to the already abundant spaces for student use.

Hours have been reduced so that the building now closes at 9 instead of 11 PM. The team was advised that, since the lockdowns in the past couple of years, students access online resources more now, and that during the hours between 9 and 11 PM there is essentially no student presence in the building. The collection is well maintained and current. Faculty recommended and required resources are generally acquired expeditiously, and current journal subscriptions are maintained. However, there are not the funds to expand the journal collections as the staff and faculty would recommend. The library has little flexibility to move resources between lines in its own budget.

Prior to the challenges of the past couple of years, the library also hosted orientation sessions for students, as well as many other community building events. More recently, orientation has been conducted online (not the preferred method as far as library staff are concerned) and faculty orientation to the learning resources is all online.

The team met with the Library Director and the Reference Librarian. Both hold Master of Library and Information Science degrees. The Reference Librarian is considered faculty as he also teaches and helps students in their Grand Rounds obligations. The library further employs 4 full time and 2 part time staff, all with higher degrees in Library Sciences, as well as 13 students. The Circulation Manager and Circulation Assistant Manager have both left the university and those positions have not been re-filled, resulting in significant extra responsibilities for the Director. This means that there is much less time and resources for future planning.

The library staff have shown themselves to be extremely resourceful in networking to maximize the resources available. They belong to CARLI (Consortium of Academic and Research Libraries in Illinois), RAILS (Reaching Across Illinois Library System), and SWAN (System Wide Automated Network). They have also managed to acquire textbooks, etc., at no charge from the Library of Congress by volunteering to be a distribution point whereby they take the responsibility for distributing books to other institutions in return for getting first choice of the material. They have also applied for grants for additional resources, being successfully awarded \$5,000 for technology upgrades (funding the purchase of 5 iPads). The team was informed that further grant applications for computer resources were discouraged as administration felt that funding to maintain the new technology was not available.

While the Reference Librarian has access to continuing education funding as a faculty member, the Library Director has a minimal budget for professional development.

**Commendation IX-1:** The team would like to commend the library staff for their collaboration, teamwork, resourcefulness and willingness to go above and beyond.

**Area of Interest IX-1:** The administration should consider providing more support to senior library staff by filling the vacant positions in the library and providing funding for continuing professional development. This will allow for more attention to future planning and protect against burn out. (Std.IX.C)

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

## **STANDARD X: PHYSICAL RESOURCES**

The university's space and facilities are more than adequate to achieve the mission of the ND Program. With 4 primary buildings surrounding a large green area and a pond, there is plenty of outdoor relaxation/study space, and room for the university to expand. The primary university buildings are Janze Hall where most of the classrooms and administrative offices are located, the library building, the clinic building, and the student center with two large lecture halls that can be merged to a single larger one, a gymnasium, and a newly renovated and equipped work out gym with a variety of machines and weights. NUHS owns the land, and these buildings, as well as four student residence buildings with 125 apartments, and several houses and empty lots along the street comprising the east border of the campus. One of the houses is the residence of their President. The university has a contractual obligation with the Town of Lombard to purchase any properties that may come for sale along that block of South Stewart Avenue, provided it does not cause undue financial hardship to the school.

Physical resources are allocated according to a 3-year plan. There is flexibility in the plan to allow for unforeseen occurrences. Staff and faculty are advised/consulted on the plan through their representative on the University Senate.

There is a well-staffed IT department responsible for maintaining and managing issues that may arise with university technology. They are available for questions from students, staff and faculty, and have proven themselves adequate through the challenges of having to move most of the university's functions to virtual due to the pandemic. The university is now moving back to in person wherever possible. All clinic patient records are kept in compliance with HIPAA regulations, and student, staff, and faculty files are also kept in a stable and secure, cloud-based system.

There are various maintenance schedules in place, maintained by both the contracted companies who provide the services (such as HVAC, fire sprinkler, and warning systems), and the Director of Facilities. A routine inspection of the fire safety equipment had just been completed at the time of our visit, and sprinklers had just been updated in the Janze Building as part of the ongoing renovations in that building. There is an emergency preparedness plan in place, and all university employees and students are made aware of this plan through respective handbooks and orientation. The university is in compliance with all federal, state, and local fire, safety, and health regulations.

It is expected that renovations will soon enter their first phase in the clinic building. This will involve creating larger clinic treatment rooms, most likely by merging three current clinic rooms into two. The pilot phase will take about two months to complete, creating two larger rooms, and allowing student clinicians to use the new rooms to make sure that they meet the requirements requested by clinicians. Upon completion of a successful pilot, a larger-scale renovation of clinic rooms will take place. The precise timeline for this had not been worked out at the time of our visit.

The maintenance department includes two grounds keepers, three maintenance people, four cleaners, and five unarmed security staff contracted with Securitas (who report directly to the Director of Facilities). All of these staff, as well as an assistant to the Director, are full time. The Securitas staff provide security to the campus 24 hours a day, 7 days a week. A lawn maintenance company is contracted to care for the extensive lawns.

**Determination: Standard X on Physical Resources is being met.**

## **STANDARD XI: CONTINUING MEDICAL EDUCATION**

### **A. Postgraduate and Continuing Medical Education**

Lincoln College of Postprofessional, Graduate and Continuing Education is a division within NUHS that provides continuing educational opportunities for individuals who wish to remain current and/or specialize in various fields of practice and meet continuing education requirements for maintaining state/provincial professional licensure/registration.

Lincoln College is managed by a dean, who has a full-time staff consisting of a Senior Education Coordinator, three Education Coordinators, and several student assistants. The team is responsible for scheduling courses and events, maintaining accurate attendance records, and for performing any necessary tasks to ensure that the instructors create learning materials and deliver education that will meet the criteria of licensing authorities. The College handles its own registration and fee collection.

Continuing education courses are offered mostly online, but there are also some in-person options. While travel restrictions during the Covid situation necessitated offering courses primarily online, online offerings will continue to be the main way these courses are delivered going forward, as they are convenient for participants and save on travel expenses. From a review of the currently offered courses, it appears that most are geared towards the needs of licensed chiropractors, but there is also a selection of courses that would be of interest to NDs.

All potential Postprofessional and Continuing Education faculty must have advanced degrees and/or specific expertise in the area they propose to teach and must provide credentials for review according to a specific format. The Dean works with the Post Graduate Committee to review the credentials and to approve CE course prior to being offered. Faculty members are formally appointed by the President of NUHS and are composed of chiropractic physicians, naturopathic physicians, and acupuncturists of varying specialties. Faculty must disclose any conflicts of interest.

Each faculty member develops his/her individual course content in collaboration with the Dean. The Lincoln College course evaluation procedure includes the review of instructor(s) curriculum vitae along with course outline(s). The course outline must include title, brief description, objectives, and an hour-by-hour breakdown of what is to be covered during the course along with any references utilized for the course content. All instructors are considered adjunct faculty of NUHS.

The University also hosts an annual event for alumni and others who wish to partake of a three-day weekend of continuing education. This event, which is known as “Homecoming,” also includes networking and social events. According to the ND program, naturopathic physicians have featured prominently in this event, and a track of programming geared towards NDs has been a feature for the past several years. The meeting and travel restrictions related to Covid caused a postponement of the Homecoming event in 2020 and 2021, but the university hopes to resume it in 2022. The NUHS alumni association makes scholarships available for current students to attend.

CE course participants must complete all course or seminar requirements before receiving a certificate of completion. Participants only receive credits for hours during which are present. Participants courses are given an opportunity to evaluate course, and the evaluations are reviewed by the Dean, faculty member who taught the course, and the education coordinators.

The ND program does not allow students do take continuing education courses as part of its core curriculum. Some ND students, however, do some acupuncture training through Lincoln College, on an elective basis, to serve as a component of requirements to be eligible to sit for

the NPLEX Acupuncture elective (required for the state of Arizona).

During the history of the ND program at NUHS, there have been several regional naturopathic medicine conferences arranged by the Illinois Association of Naturopathic Physicians and supported and sponsored by Lincoln College.

**Determination: *Standard XI on Continuing Medical Education is being met.***

## **COMPLIANCE WITH CNME POLICIES**

The team found NUHS to be in compliance with CNME policies.

## LIST OF COMMENDATIONS

**Commendation I-1:** The university has a strong commitment to aligning its programs and activities with the university mission and has developed a strategic planning process promotes this alignment.

**Commendation IV-1:** The team commends the faculty involved in all aspects of the ND program for their expertise, as well as their commitment, collaboration, and resilience in the face of daunting challenges over the last couple of years.

**Commendation V-1:** The team commends the professionalism and organization of the Student Services Dept.

**Commendation VI-1:** The efforts underway to ensure consistency and accuracy in program materials such as syllabi, and to create ongoing systems and implementation of software that facilitates consistency going forward.

**Commendation VI-2:** The ‘Sim Lab’ in the 5th trimester using standardized patients provides an outstanding formative clinical experience.

**Commendation VIII-1:** The research department has taken a number of steps to increase the amount of naturopathic medicine-related research activities and to more extensively involve ND students in research.

**Commendation IX-1:** The team would like to commend the library staff for their collaboration, teamwork, resourcefulness and willingness to go above and beyond.

## LIST OF RECOMMENDATIONS

**Recommendation VI-1:** The team is concerned that there is a lack of sufficient diversity in the patient conditions/pathologies and demographics/populations of the patients that students treat; this situation may be due to an overreliance on using students and student family members as patients, the current lack of external clinical sites, and insufficient teaching clinic marketing efforts. This lack of diversity needs to be remedied.

**Recommendation VII-1:** While the ND program engages in a range of assessment activities and processes related to both individual students and the program as a whole, the ND program has not codified its assessment activities into a comprehensive plan. Additionally, the program relies on only a few key assessment benchmarks. The program needs to develop and implement a comprehensive assessment plan that sets forth benchmarks, timelines, processes and responsible individuals. (Std.VII.B.1)

## LIST OF AREAS OF INTEREST

**Area of Interest I-1:** The program needs to review its programmatic mission in light of its revised curriculum, including providing opportunities for stakeholder input. (Std.I.B.1)

**Area of Interest III-1.** Given the current and projected operating deficits, the institution must continue to adequately fund the program to ensure its that administrative and faculty staffing needs—and other needs—are met. (Std.III.C.1)

**Area of Interest IV-1:** A number of faculty said that they have been asked to teach new courses without sufficient lead time to prepare and also occasionally in subject areas outside of their expertise. While the team realizes this may sometimes be necessary, the program should examine this situation to determine whether there may be a substantive issue (e.g., insufficiency of faculty in certain subject areas) that needs to be addressed, especially since such situations may erode faculty morale and lead to burnout. (Std.IV.B.1)

**Area of Interest IV-2:** Orientation of new faculty who teach in the ND program appears to be carried out inconsistently. This issue, which has been identified as part of the Action Plan arising from the 2021 self-study process, needs to be addressed. (Std.IV.C.1)

**Area of Interest IV-3:** The program should take steps to ensure that non-ND faculty are introduced to naturopathic medicine early in their tenure so that these faculty members understand the academic needs of the ND students they teach. (Std.IV.C.1)

**Area of Interest IV-4:** To the degree that faculty may be using less effective and outmoded pedagogical practices for course delivery—especially in the context of online courses—faculty should be encouraged to make use of the Instructional Design staff and other resources on pedagogy that NUHS provides to faculty as part of its faculty development resources. (Std.IV.D.2)

**Area of Interest IV-5:** The model of shared governance at NUHS is generally consultative where faculty are welcome to provide suggestions and are asked for feedback on changes to policies and curriculum. There are a number of committees, including a faculty senate, in place to facilitate this approach to governance. However, it seems that some of these structures are currently not fully operational. The program and institution should review how faculty governance is currently operating to determine whether its operations are consistent with how it is structured. (Std.IV.E.1)

**Area of Interest IV-6:** Faculty pay has remained constant since 2016, with the only increase in remuneration being in the form of an occasional bonus; this appears to have had adverse impact on faculty morale and may be an impediment to timely recruitment to fill faculty positions. (Std. IV.F.3)

**Area of Interest VI-1:** The number of combined DC-ND courses taught by non-NDs and the amount of time that ND students devote to DC-ND courses may not be optimal in regard to the academic and training needs of ND students, which in turn may have a negative impact on

NPLEX success and student satisfaction. The program should carefully review the shared courses to make sure that they reasonably meet the needs of the ND students.

**Area of Interest VII-1:** NPLEX results have, in recent year, been relatively low; while the team understands that steps have been and are currently being taken to improve scores, the program needs to consistently monitor NPLEX results and continue to explore ways to help students improve their performance. (Std.VII.B.5)

**Area of Interest IX-1:** The administration should consider providing more support to senior library staff by filling the vacant positions in the library and providing funding for continuing professional development. This will allow for more attention to future planning and protect against burn out. (Std.IX.C)