

9/19/22

To the CNME standards committee:

My name is Ryan Hofer and I am a Naturopathic Medical Student at NUNM. This open letter is my way of contributing to the revision of CNME's accreditation standards. My comments are informed by two years at NUNM, participation in a recent evaluation visit, my professional teaching experience, and my Masters in Teaching credential. I hope they will be taken in good faith and utilized in the revision process.

General Comments:

The current evaluation of the standards, and the call for comments, has not been publicized to students, as far as I can tell. I only learned of the revision process through a visit to your website. There is no publicly available roadmap, nor any designated point at which students will be engaged in the standards revision process. Apart from private correspondence, the only chance I have found for ND students to engage directly with programmatic accreditation is during a one-time meeting with the evaluation team which happens every seven years. In the interest of authentic, evidence-informed collaboration, I believe the standards committee and campus evaluation teams should look for ways to get organized information directly from students, and I request that you provide opportunities for students to be a part of this current revision of standards. I also request that you consider adding a student member to your board. Making these opportunities available would benefit the entire quality assurance process, and it would be a chance for students to connect into their professional world beyond the classroom.

Along the same lines, the CNME could define a minimal set of information that programs should publicly share. There is currently no requirement to share any accreditation visit results, including recommendations for improvement. Contrast this with [the NWCCU directory](#), which publicly posts letters to each member institution, including progress towards meeting recommendations. The CNME could also increase clarity by providing clear rubrics for the essential aspects of each standard and establish checkpoints within the seven years between full program self-reports.

The accreditation handbook contains several different kinds of documents with different purposes, including the articles of incorporation and the bylaws. Separating out documents based on purpose would help with communication. For example, the standards, accreditation process, and bylaws could all be separate pdfs on the CNME website. In particular the standards could be posted directly on the website for promotion and easy reference.

The bibliography within the handbook contains two references. There doesn't seem to be any references for the standards. What evidence basis is the CNME using to maintain contemporary standards? The revision process is a good time for the CNME to cite sources and link to them within the pdf.

Comments on Specific Standards

4.C.2, 4.D.1, and 4.D.2

Faculty evaluation standards, including the program's standards for on-going professional development to enhance instructional effectiveness, should be published and widely available to all program constituents. Students are directly affected by teaching practices, and should understand how their program is continually improving the instruction their tuition dollars support.

5.A.3

Along with providing the means for systematically obtaining student views, there should also be clear evidence that student input results in organized, meaningful change.

6.A.3

Programs should provide evidence of chosen best practices that foster a community of learning and a robust evidence base for those practices.

6.A.5

Course competencies need to be specific and appropriate for a graduate level course. It's easy to write vague competencies that don't actually communicate what students should be able to do at the level of the coursework being described. Specific competencies translate well into focused assessments students can confidently prepare for, vague competencies do not. There should be a clear process for review of syllabi and competencies. Evaluation teams should use a CNME rubric to carefully review a sample of core curriculum syllabi to check for appropriate competencies, and for assessments that are directly aligned with those competencies.

7A

Program assessment plans should be published and widely available, and improved across time. Assessment formats and procedures should be evidence-informed, community-negotiated, and in alignment with contemporary best practices in higher education. Both the composition and the interpretation of program assessments should be done in a community context, in alignment with Core Principle Number One.

7.B.4

What are the data gathering instruments based on? Are they validated by 3rd parties? Are they composed through a grounded, community engagement process? The collection and interpretation of program performance data can be made resistant to bias through strong connections to educational and polling research.

In collaboration,

A handwritten signature in black ink that reads "Ryan Hofer". The signature is written in a cursive, slightly slanted style.

Ryan Hofer, MS, MAT, LMT