

Petition for Renewal of Recognition
by the U. S. Department of Education of the

COUNCIL ON NATUROPATHIC MEDICAL EDUCATION
and its
COMMISSION ON ACCREDITATION

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as the National Accrediting Agency
granting the statuses of
Accredited and Recognized Candidate for Accreditation

for

Colleges and Programs Providing
Professional Education for Naturopathic Physicians

VOLUME I

Submitted June 12, 1989

Volume I : Petition and Exhibits 1 to 19
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CNME Petition for Renewal of Recognition

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**Petition for Renewal of Recognition of the
Council on Naturopathic Medical Education**

The Council on Naturopathic Medical Education requests a renewal of its recognition by the U.S. Secretary of Education as the national accrediting agency for institutions and programs providing professional training for naturopathic physicians.

The Council requests renewal on the basis of its compliance with the criteria, published in 1988 in Title 34 of the Code of Federal Regulations, established by the Secretary of Education for the recognition of accrediting agencies. Each criterion, stated below, is followed by what the Council believes is evidence of compliance both in intent and in specifics.

602.10 Criteria for Recognition

(a) The Secretary recognizes an accrediting agency only if the Secretary determines that the agency is a reliable authority as to the quality of the education or training offered by postsecondary educational institutions or programs within the agency's scope of activity, taking into account the degrees or certificates offered and the education or specific occupational training offered. In making this determination, the Secretary decides whether the agency possesses the characteristics and follows the procedures described in this subpart.

The Council on Naturopathic Medical Education was established in 1978 as a national organization to evaluate and accredit colleges of naturopathic medicine in the United States (see Exhibit 3, Articles of Incorporation, Third Article (c)). Colleges which become accredited or recognized candidates for accreditation by the CNME's Commission on Accreditation become Institutional Members of the CNME. The Commission may also confer Communicating Membership, but not accreditation, on a "foreign naturopathic medical college that subscribes to the policies and regulations" of the CNME (see Exhibit 4-2, Resolution of Amendments to Articles of Incorporation, Fifth Article (a)(3)).

Historically, and due to a lack of licensure and regulation in many states, there has been great variation in the quality and length of training for naturopathic physicians. There have been, for example, a number of schools which have offered an obviously

inadequate curriculum of correspondence courses, or a very restricted number of contact hours, or curricula with no clinical training involved yet leading to the Doctor of Naturopathy degree. Graduates of such schools would not qualify for licensure in states and Canadian provinces that license naturopathic physicians (see Exhibit 5-5, Arizona statutes 32-1522, paragraph A.1. and 2.; Exhibit 6-1, Alaska statutes, Sec. 08.45.030 (2); Exhibit 7-2, Connecticut statutes, Sec. 20-37; Exhibit 8-3, Hawaii statutes, Chapter 455-3; Exhibit 9-2, Oregon statutes, Chapter 685.060; Exhibit 10-5, Washington statute). It is therefore unreasonable for such schools to hold out the prospect of sanctioned practice opportunities to potential students. Graduates of schools with inadequate standards may be unable to adequately discharge the responsibilities of diagnosis and treatment indicated in the Department of Labor's definition of a naturopathic physician, in the various states' laws, and the expectations of their patients. If they practice without further training, they may constitute a danger to the public. The standards of the CNME are drawn with an eye toward satisfying the requirements of all states and Canadian provinces which license naturopathic physicians and toward insuring public safety to the extent possible through the educational process.

It is the stated purpose of the CNME to advocate high standards in professional education (Exhibit 3-2, Third Article, (a)). The original organization meeting of the CNME in Denver, Colorado August 11-13, 1978 included 49 representatives of virtually every naturopathic licensing board, professional association, and naturopathic college in the U.S. Standards were established soon after by the Board of Directors who included representatives of three naturopathic colleges, practicing naturopaths from seven states, two representatives of the Federation of Naturopathic Medical Licensing Boards, and two public members, one of whom, Dr. Roger Eckerberg, was an employee of the Department of Health, Education and Welfare, the other being a faculty member of the University of Puget Sound (see Exhibit 3, Articles of Incorporation, page 3-10). The Educational Standards and Accreditation Procedures (ESAP) (Exhibit 11, under separate cover) underwent a major revision for clarity and to eliminate potential conflicts of interest in 1986 with the input of the naturopathic colleges and the Council members at that time (see Exhibit 12) and with commentary from its constituencies. The Council communicates with all institutions in the United States and several in foreign countries that the Council knows of that have ever offered the N.D. or N.M.D. degree, state and national professional societies of naturopathic physicians, associations of naturopathic medical students, naturopathic licensing boards, accrediting agencies and other interested parties (see Exhibit 24, Circulation List). The ESAP has since had further revisions to take account of changing laws and to ensure the educational effectiveness of programs included in its mission.

602.10

(b) To be recognized by the Secretary, an agency must satisfactorily meet each of the criteria in paragraphs 602.11 - 602.19 unless it can demonstrate to the Secretary's satisfaction why one or more criteria should not appropriately be applied.

(c) For purposes of the determination in paragraph (b) of this section, each section, taken as a whole, constitutes a criterion.

As demonstrated below, the CNME has a reliable history of accrediting activities within its scope of operations. It publishes or makes available clear information regarding its purpose and operations. Its standards are accepted by nearly all professional agencies and regulatory bodies who have an interest in its activities. It has demonstrated that it has sufficient resources to carry out its activities fairly and effectively. It has adopted policies which focus attention on the outcomes of the educational process and requires its member institutions to provide adequate information to the public. It plays a responsible and vital role in the community of educational accrediting agencies.

602.11 Experience.

An accrediting agency must demonstrate sufficient experience with respect to both--

- (a) The geographical scope of activity for which it seeks recognition;
- (b) The specific degrees, certificates, and programs which would be covered by its recognized accreditation and preaccreditation activities.

The CNME has steadily matured both in structure and outcome in the last ten years. It has already become very beneficial to the the development of quality in naturopathic medical education.

In terms of geographical scope, the Council has received applications from naturopathic institutions in Arizona, California, Missouri, Oregon, and Washington. Its Board of Directors are representatives of educational institutions, licensing authorities, professional associations and the public who reside in Arizona, Connecticut, Hawaii, Nebraska, Oregon, and Washington. It may accept applications for accreditation review from naturopathic programs anywhere in the United States.

The following chronology of CNME activities is submitted in support of the experience Criterion:

- 1978 - CNME is incorporated as the successor to the Certification and Accreditation Committee of the National Association of Naturopathic Physicians, then the largest naturopathic professional organization.
 - Accreditation Guidelines and Procedures published.
 - Arizona College of Naturopathic Medicine applies for the then available Correspondent status (Exhibit 13-1). Application was later withdrawn.
- 1979 - CNME applies for Initial Recognition with U.S. Office of Education and receives analyses 6/79 and 5/80. Petition withdrawn for future re-submission.
 - National College of Naturopathic Medicine applies for Recognized Candidate status (Exhibit 13-3, 4, and 5).
 - John Bastyr College of Naturopathic Medicine, Ontario College of Nat. Med., and Pacific College of Nat. Med. apply for Correspondent status (Exhibit 13-4).
 - Arizona College of Naturopathic Medicine and Surgery (a post-graduate program, different form Arizona College above) applies for Communicating status (Exhibit 13-4). Since 1986, "Communicating" status has been reserved for foreign schools.
- 1980 - Site visits done at PCNM, NCNM, JBCNM (Exhibit 14).
 - JBC and PCNM granted Correspondent status (Exhibit 15).

- 1981 - CNME becomes 501(c)(3) IRS exempt (Exhibit 16).
Establishment of CNME Executive office with William Tribe as first Executive Director.
- Missouri College of Naturopathic Physicians applies for Communicating Status (Exhibit 13-6).

1981-1983 - John Bastyr College and National College of Naturopathic Medicine seek Candidate for Accreditation status from Northwest Association of Schools and Colleges after NASC indicates a willingness to evaluate their programs.

With other routes to accreditation available, the need for the CNME accrediting activities seems less urgent and the Council becomes accordingly less active. During this time, official CNME records were moved to San Rafael, California and were stored in a school building that housed the now defunct Pacific College of Naturopathic Medicine. Though the San Rafael School District has been contacted and a searcher has been sent by the CNME in the effort to locate them, they have never been found. Records of older transactions remain patchy.

In 1983, Candidate status was awarded to John Bastyr College by the Northwest Association and a self-study and site visit by Northwest was completed at National College of Naturopathic Medicine.

Then, the Northwest Association adopted a policy prohibiting further accreditation by it of free-standing "institutions whose sole purpose is highly specialized professional or vocational" education. The Northwest Association was the only regional accrediting body in the U.S. with such a rule. After Bastyr College added additional degree programs, Northwest modified its rule to exclude schools whose "primary" purpose was specialized education (Exhibit 35). Since both of the remaining four year naturopathic colleges are in its jurisdiction, the rule seemed to eliminate their possibilities for accreditation.

1985 - The American Association of Naturopathic Physicians, recognizing the public and professional need for a viable accrediting body for institutions training naturopathic physicians, stimulates the renewed activity of the Council on Naturopathic Medicine. New officers are elected and changes are made in the Articles of Incorporation to eliminate inefficient procedures and potentially conflicted organizational structure, establish a firmer financial base, and increase membership. A professional and well qualified Executive Director, James Moore, a former official of the Department of Education, was hired.

- 1986 - The Educational Standards and Accrediting Procedures (ESAP) is published.
- National College applies for Recognized Candidate.
 - John Bastyr College applies for full Accreditation.

- Site visits accomplished at NCNM and JBC.
- Commission decisions rendered, with recommendations to the Colleges. NCNM is denied, JBC is deferred.
- CNME submits new Petition for Initial Recognition and receives preliminary DOE staff review; appears before National Advisory Committee on Accreditation Agency Eligibility and gets recommendation for one year's Recognition.
- NCNM reapplies for candidacy.

- 1987 - Candidacy status granted to National College of Naturopathic Medicine.
- JBC granted accreditation for three years.
 - Secretary Bennett grants recognition to CNME for one year.

The Criteria for Recognition by the Secretary of Education were then modified.

- 1988 - Educational Standards and Accreditation Procedures reviewed, modified, and republished.
- CNME submits Petition for Renewal of Recognition and gets recommendation for two years from AAEB staff; appears before NACAAE and gets recommendation for one year's Recognition.

- 1989 - CNME procedures and standards undergo third revision.
- Ontario College of Naturopathic Medicine applies for Communicating status.
 - NCNM has Candidacy status reviewed and is granted extension for two years.
 - Bastyr College reviewed early at its request. Site visit done in conjunction with Northwest Association of Schools and Colleges. Granted accreditation for five years.

The Council and its Commission on Accreditation seek a renewal of recognition for the granting of the statuses of Accredited and Recognized Candidate for Accreditation for institutions and programs granting the Doctor of Naturopathy or Doctor of Naturopathic Medicine (N.D. or N.M.D.) degrees (Exhibit 11, page I-5). These degree titles represent completion of the same course of studies and the specific title depends on the laws of the state in which a school granting the degree is located. The chronology above outlines our experience with the process at each level.

A naturopathic physician is defined in the U.S. Department of Labor's Dictionary of Occupational Titles, 4th Ed. as follows:

Doctor, Naturopathic (medical services) 079.101-014

Naturopathic Physician - Diagnoses, treats and cares for patients, using a system of practice that bases its treatment of physiological functions and abnormal

conditions on natural laws governing the human body, utilizes physiological, psychological and mechanical methods, such as air, water, heat, light, earth, phytotherapy (treatment by use of plants), food and herb therapy, psychotherapy, electrotherapy, physiotherapy, minor and orificial surgery, mechanotherapy, naturopathic corrections and manipulation, and natural methods or modalities, together with natural medicines, natural processed foods, and herbs and nature's remedies. Excludes major surgery, therapeutic use of x-ray and radium and use of drugs, except those assimilable substances containing elements or compounds which are components of bodily tissues and are physiologically compatible to body processes for maintenance of life.

Additional descriptive information on the profession and its philosophy and practice is contained in brochures from the American Association of Naturopathic Physicians and the Oregon Association of Naturopathic Physicians reproduced as Exhibits 1 and 2, respectively.

The degree level is that of a "first professional degree," and is the educational equivalent of other first professional degrees such as the M.D., D.C., D.O., or D.D.S. The first professional degree ususally requires a minimum of two academic years of previous college work for entrance and a total of at least six years of college work for completion. The CNME standards call for three years of college course work before admission (Exhibit 11, page III-8) and a curriculum extending over 12 academic quarters or four years (Exhibit 11, page III-11) for a total of at least seven years. The recognition requested by the CNME of the Secretary of Education for accreditation activities for the N.D. or N.M.D. degrees is similar to that of The Council on Chiropractic Education for the Doctor of Chiropractic (D.C.) or of the Liaison Committee for Medical Education for the M.D. degree.

The Articles of Incorporation were amended in 1986 to allow accreditation of "naturopathic medical education programs within multi-purpose institutions" (Exhibit 5, page 5-1) as well as single purpose naturopathic medical colleges. In practice, in examining naturopathic medical programs within a multi-purpose institution, the CNME looks at scholastic regulations, curriculum, faculty, and facilities devoted to the program as well as organizational and legal structures and activities of the parent institution necessary to support the program and which are required to satisfy the criteria published in Sections II A. and III of the Educational Standards and Accreditation Procedures (see Exhibit 18, Bastyr College Self-study and Exhibit 20, Bastyr College site visit reports, for an example of program accreditation review).

602.12 Scope of Activity

The Secretary determines whether an accrediting agency--

(a)(1) Is national in the scope of its operation; or (2) Includes in its geographical scope of operation at least three States that are contiguous or that otherwise constitute a distinct geographic region, and defines its accrediting activity as the accreditation of entire institutions;

As stated in the Articles of Incorporation (Exhibit 3, Third Article, page 3-1), the purposes of the CNME are to advocate high standards and establish criteria of institutional excellence in naturopathic medical colleges, publish a list of naturopathic medical colleges conforming to its policies, and engage in those organizational activities which allow it to pursue its primary goals. It is described in the Articles as a "national organization" and its regular accrediting activities are restricted to institutions in the United States through the implication of its Fifth Article (a)(3) which sets out a category of Communicating Membership for foreign colleges. Communicating status requires adherence to the same standards that pertain to Recognized Candidates for Accreditation and the ESAP (Exhibit 11, page I-7) indicates that this status is not accreditation.

602.12(b)

The Secretary determines whether an accrediting agency--

(b) Accredits types and academic levels of institutions or programs that must be accredited by an accrediting agency recognized by the Secretary in order for those institutions or programs, or their students, to be eligible for participation in one or more Federal programs.

There are at present two schools holding status with the CNME. Both schools are in the accreditation region of the Northwest Association of Schools and Colleges. As indicated in the response to Criterion 602.11, NASC has a rule which prevents it from accrediting single-purpose free-standing institutions. It has adopted a further ruling that it may accredit single-purpose schools in conjunction with a specialized accrediting agency. Of the two schools holding status with the CNME, one, Bastyr College, holds Candidacy status with NASC. It achieved this status before NASC's single-purpose rule was adopted but the present rules prevent Bastyr from moving on to full accreditation without a recognized naturopathic professional accrediting agency. Bastyr College is close to NASC's six year limit on Candidacy. A joint site visit with NASC and the CNME was

completed at the College in April 1989. Thus, the continued participation of the College's students in Federal programs is dependent on CNME recognition. National College of Naturopathic Medicine has been prevented from even applying for Candidacy with NASC in recent years due to the rule. Its students may participate in Federal student loan programs as a result of its Candidacy with the CNME.

602.13 Clarity of purpose, scope, and operational information.

The Secretary determines whether an accrediting agency maintains, and makes publicly available, current written material clearly describing each of the following matters:

(a) Its purposes and objectives.

The purposes and objectives of the Council are stated in the Articles of Incorporation (Exhibit 3-2). They are also stated, with extensions adopted by the Board of Directors on March 2, 1986 (Exhibit 17-b), on page I-4 of the Educational Standards and Accreditation Procedures (Exhibit 11). They are:

1. To insure high standards in naturopathic medical education;
2. To establish criteria of institutional excellence in naturopathic medical education;
3. To evaluate and accredit naturopathic medical colleges and educational programs in naturopathic medicine;
4. To publish lists of those naturopathic medical colleges and programs which conform to its standards and policies;
5. To assure the educational community, the general public, and other agencies or organizations of the academic credibility of naturopathic educational programs and colleges;
6. To provide counsel and assistance to established and developing naturopathic institutions;
7. To protect naturopathic institutions against encroachments which might jeopardize their educational effectiveness or academic freedom.

602.13

(b) The geographical area and types and academic levels of educational institutions or programs covered by the agency's accrediting activity.

The agency was established as a "national organization" as demonstrated in Section I C. "History and Scope" of the ESAP (Exhibit 11, page I-5). It was incorporated in Washington, D.C. and its regular accrediting activities are restricted to institutions in the United States through the implication of its Fifth Article (a)(3) (Exhibit 4-2) which sets out a category of Communicating Membership for foreign colleges. Communicating

status requires adherence to the same standards that pertain to Recognized Candidates for Accreditation and the ESAP (page I-7) indicates that this status is not accreditation.

The N.D. or N.M.D. is a "first professional degree," and is the educational equivalent of other first professional degrees such as the M.D., D.C., D.O., or D.D.S. The first professional degree normally requires at least two academic years of previous college level work for entrance and a total of at least six years of work for completion. The CNME standards call for three years of college course work before admission (Exhibit 11, page III-8) and a curriculum extending over 12 academic quarters or four years (page III-11) for a total seven years. The Recognition requested by the CNME of the Secretary of Education for the N.D. or N.M.D. degrees is similar to that of The Council on Chiropractic Education for the Doctor of Chiropractic (D.C.) degree or the Liaison Committee for Medical Education for the M.D. degree (Exhibit 11, page I-6). The N.D. or N.M.D. program granted status must demonstrate that its purposes are "appropriate to the preparation and training of naturopathic physicians (Exhibit 17L-2)." Students, before graduation, must "demonstrate educational achievement appropriate to patient care (Exhibit 17L-9)." Given their future responsibilities in diagnosis and therapeutics, this is taken to mean primary care.

The Commission on Accreditation of the Council grants statuses of Accredited, Recognized Candidate for Accreditation, and Communicating (Exhibit 11, page II-5). The Council seeks Recognition by the Secretary for its activities related to the first two of these.

The Articles of Incorporation were amended in 1986 to allow accreditation of "naturopathic medical education programs within multi-purpose institutions" (Exhibit 4-1) as well as single purpose naturopathic medical colleges. In examining programs within a multi-purpose institution, the Commission on Accreditation looks at scholastic regulations, curriculum, faculty, and facilities devoted to the program as well as organizational and legal structures and activities of the parent institution necessary to support the program and which are required to satisfy the criteria published in Sections II A. and III of the ESAP. If the program is accredited by the Commission, the Council will admit the parent institution to membership (Exhibit 11, page I-7).

602.13

(c) The definition of each type of accreditation and preaccreditation status, including probationary status, if any, that the agency grants.

A general definition of accreditation and some information about the different levels is on page I-7 of the ESAP (Exhibit 11). There is additional information distinguishing Accredited from Recognized Candidate in the opening of Section II A. on page II-3 and is continued on page II-5. Confidential probation and public probation are explained on page II-22.

602.13

(d) The criteria and procedures used by the agency for determining whether to grant, reaffirm, reinstate, deny, restrict, or revoke each type of accreditation and preaccreditation status that the agency grants.

The criteria used by the Commission for granting, reaffirming, reinstating, denying, placing on probation, or revoking status are published in Section II A. and Section III of the ESAP (Exhibit 11).

602.13

(e) The standards to which an agency holds an educational institution or program for the purpose of making determinations respecting each of the criteria referred to in paragraph (d) of this section.

The ESAP uses the word "standards" to refer to the criteria of paragraph (d) above. The Petition writer's understanding of "standards" as used in this paragraph ((e)) is the level of performance at which the criteria of paragraph (d) must be met.

The practice of the Commission in relation to the criteria demonstrated under paragraph (d) is now clarified in a recently adopted modification of the opening paragraph of Section II A.:

To be eligible to enter into the accreditation process, a college must present reasonable evidence of its academic, organizational and financial ability to meet the General Eligibility Standards below. In addition, [to be

accredited,) the institution applying for accreditation must meet the Educational Standards listed in Section III unless the institution can demonstrate to the satisfaction of the Commission on Accreditation why one or more standards should not be applied and what equivalent structures and processes respond to the standard. Institutions applying for Candidacy must show evidence of being able to comply with the Educational Standards within six years. (Exhibit 11, page II-3 and Exhibit 17L-2)

The new edition of the Educational Standards and Accreditation Procedures will be published in the summer of 1989.

Besides this general standard, specific standards associated with different criteria are set out in conjunction with each criterion. Some criteria are to be met exactly as stated and are written with predicates such as "must be" or "shall have" such as many of the General Eligibility Standards (page II-3) or college bulletin requirements (page III-7 and Exhibit 17L-8). Others are guidelines with predicates of "should be" or "expected to be" such as in the criteria on Research (page III-15). These criteria are interpreted as requiring explanation or alternatives if they are not present as stated. Some standards are expressed as minimums such as clock hours required in different curriculum areas (page III-11). Where appropriate, a range may be given such as in the proportion of laboratory to lecture teaching (page III-11). Example of acceptable means of meeting a criteria may be given such as in grading systems (page III-10). As more experience is gained standards will continue to evolve.

602.13

(f) The procedures established by the agency for appeal of its denials or withdrawals of accreditation or preaccreditation status.

The procedure for appeals of adverse actions of the Commission on Accreditation is presented in Section II J. "Appeals Policy and Procedure" of the ESAP (Exhibit 11, page II-24).

602.13

(g) The procedures followed by the agency for the timely review of complaints pertaining to institutional or program quality, as these relate to the agency's criteria, in a manner that is fair and equitable to the person making the complaint and to the institution or program.

The procedure for complaints against institutions holding status with the Council is presented in Section II O. "Procedure for Grievances against Member Institutions" (page II-34). It has recently been modified as follows:

Persons having a complaint pertaining to institutional or program quality of any member school shall first exhaust institutional remedies and procedures for resolution of complaints. If the complaint cannot be resolved in this manner, the complainant may submit a written account of the situation to the President of the CNME or his/her designee. The President or designee will determine if the complaint is in an area addressed by the standards and regulations of the Council within fifteen days and, after informing the institution of the nature of the complaint and accepting the institution's response, will render a recommendation within sixty days of the lodging of the complaint. If either party remains unsatisfied with either the recommendation or its implementation, s/he may bring the matter to the full Council at its next meeting. The decision of the Council as to recommendation and implementation will be final. (Exhibit 17L-8)

This modified procedure will appear in the next edition of the ESAP.

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(h) The current accreditation or preaccreditation status publicly conferred on each educational institution or program within the agency's scope of operation, and the date of the next currently scheduled review or reconsideration of accreditation of each of those institutions or programs.

There are two institutions presently holding status with the CNME. Bastyr College of Natural Health Sciences in Seattle, Washington has an Accredited N.D. degree program. Its next schedule review is in 1994. National College of Naturopathic Medicine in Portland, Oregon is a Recognized Candidate for Accreditation and is scheduled for its next review in 1991.

The Council makes information regarding the accreditation status of institutions and dates of next review available on request (e.g., Exhibit 25). Its current information sheet is presented as Exhibit 29. It has also given this information to the Department of Education several times. News of the Council's and Commission's activities is regularly published in the American Association of Naturopathic Physicians Newsletter (e.g., Exhibit 26). The offer has been made to provide the same information for the newsletter of the American Naturopathic Medical Association (Nevada chartered) when it has one (Exhibit 27-2). A brochure containing the member institutions has been in preparation (Exhibit 28).

The availability of this information to the public is being made more explicit by the addition of a sentence to the next edition of the ESAP on page I-7: "A list of institutions and programs holding status with the CNME, the level of present status, and the dates of the next scheduled reviews is available from the Executive Director (Exhibit 17L-2)."

602.13

(i) **The names and relevant employment and organizational affiliations of the members of the agency's policy and decision-making bodies responsible for the agency's accrediting activities, and the names of the agency's principal administrative staff.**

The current membership of the CNME with relevant employment and organizational affiliations is presented as Exhibit 30. This information is also available upon request from the Executive Director. It has been provided several times to the Department of Education and is in the public record. The availability of this information to the public is being made more explicit by an addition to the next edition of the ESAP on page I-3: "The names, relevant employment, and organizational affiliations of Council members are available from the Executive Director (Exhibit 17L-1)."

The CNME has one paid staff member, the Executive Director. His name, address and telephone number are printed inside the front cover of the ESAP.

602.13

(j) Provisions for the inclusion of representatives of the public in its policy and decision-making bodies, responsible for its accrediting activities or for the retention of advisors who can provide information about issues of concern to the public.

The Council and its Commission on Accreditation have provisions for two public members. They are appointed by the other members from nominations of the membership (Exhibits 3-7 and 4-3). Their names and addresses are presented in the membership list (Exhibit 30). They may not be naturopathic physicians nor affiliated with a college of naturopathic medicine. Recently, an amendment to the By-laws was adopted to limit them to no more than two terms of three years each so that they will not form too close an identification with the interests of the profession (Exhibit 17L-11).

602.13

(k) With regard to institutions or programs of study that admit students on the basis of their ability to benefit from the education or training offered, any criteria established by the agency with respect to nationally recognized, standardized, or industry-developed tests designed to measure the aptitude of prospective students to complete successfully the program to which they have applied.

The CNME has no criteria established with respect to measures of a potential student's ability to benefit from the educational program offered. Requirements for pre-professional education are fairly rigorous and are presented on page III-8 of the **ESAP** (Exhibit 11).

602.14 National Recognition

The Secretary determines whether an accrediting agency demonstrates that its policies, evaluation methods and decisions are accepted throughout the United States by, as appropriate--

- (a) Educators and educational institutions;
- (b) Licensing bodies; practitioners, and employers in the professional or vocational fields for which the educational institutions or programs within the agency's jurisdiction prepare their students; and
- (c) Recognized agencies.

There are three resident naturopathic degree granting institutions in North America that we are aware of: Bastyr College in Seattle, Washington, National College in Portland, Oregon and Ontario College in Toronto, Canada. The first two hold status with the Council. The other has made application for Communicating status, the Council's status for foreign schools (Exhibit 31). None have ever commented negatively on CNME standards or policies. None have appealed a decision of the Commission. Two schools which do not grant the N.D. or N.M.D. have asked to be evaluated, but the Council was unable to assist them (Exhibit 46).

The Council's present standards were constructed through careful review of the state laws regulating naturopathic medicine, the educational programs at existing naturopathic colleges, education programs at medical and other health care system schools, the institutional accreditation standards established by federally recognized regional accrediting agencies, the standards of the Council on Postsecondary Accreditation, and the rules and regulations of the U.S. Department of Education. They have had the input of the Council's public members, both professional educators, one of whom is the Dean of Students at Whitman College with a PhD in physics, the other with a doctorate in education (see Exhibits 32 for resumes). It was incorporated in 1978 with three naturopathic and two non-naturopathic educators on its original Board, one of whom was an employee of the Dept. of HEW, and the other a faculty member of the University of Puget Sound (Exhibit 3-9). Its previous Executive Director, James Moore, was a former educator and a retired executive of the Department of Education (Exhibit 33). Its present Executive Director, Cecil Baxter, PhD, is President Emeritus of North Seattle Community College and has participated in many accrediting activities with the Northwest Association of Schools and Colleges (see Exhibit 34, Resume). Site visitors have included the former President of the LDS Business College in Salt Lake City who has extensive experience in site visits for the Northwest Association, a retired Assistant Dean and full Professor at Oregon State University's

School of Education, the Vice-President for Finance of George Fox College, and several educators in naturopathic medicine. The CNME received the endorsement of a formerly competing accrediting agency for naturopathic medical education (Exhibit 36). It has received the endorsement of the Associated Students of NCNM (Exhibit 37). Three groups interested in starting naturopathic colleges have contacted the CNME for assistance with their development plans.

The CNME standards are drawn with an eye to satisfying the requirements of the laws of the states that license naturopathic physicians. Recently, for example, the Council augmented required hours of instruction in manipulation in response to a higher requirement imposed by the state of Washington (Exhibit 17L-10). Graduates of schools which hold status with the CNME are eligible for licensure in all of the states and Canadian provinces that license naturopathic physicians.

There are provisions in the Articles of Incorporation for two representatives of the Federation of Naturopathic Medical Licensing Boards (Exhibit 4-3). While there has been at least one representative of the Federation at every meeting of the CNME and the Commission since its inception, both these seats were vacant at the last meeting of the CNME as the Federation is reorganizing and reincorporating. However, both the old corporation and the new one have endorsed the standards of the CNME and appointed representatives to sit on the Council (Exhibit 38 and 39). It is expected that by the next meeting of the CNME in November, 1989, the two members will be seated (Exhibit 17m-1). There were two licensing board members on the original Board of Directors of the CNME (Exhibit 3-10). Standards are distributed to all naturopathic licensing boards in the U.S. and Canada and no negative comment has been received.

In Arizona, there was recently signed into law in Sec. 32-1501 of the Arizona Revised Statutes under "Definitions":

School of naturopathic medicine means a school or college offering a course of study which, on successful completion, results in awarding the degree of Doctor of Naturopathic Medicine and whose course of study was approved by the Board or was approved or accredited by an educational or professional association, recognized by the Board, including the Council on Naturopathic Medical Education or its successor if certified by the U.S. Department of Education as a specialized accrediting agency (Reference: Michael Cronin, N.M.D., member Arizona State Naturopathic Physicians Board of Examiners, 1645 W. Jefferson, Room 312, Phoenix, AZ 85007, (602) 542-3095).

The opening sentence of Connecticut's statute allows the CNME to prescribe what the practice of naturopathy consists of, though the Council has not undertaken this task except by the implications of its educational standards (Exhibit 7-1).

Oregon's Board of Naturopathic Examiners Administrative Rules name only the Council as an acceptable accrediting agency (Exhibit 9-9).

The CNME has been requested to provide information on naturopathic medicine by the Nebraska legislature during recent hearings on licensure in that state (Exhibit 47).

The CNME has the endorsement of the Naturopathic Physicians Licensing Examination (NPLEx) Board, an agency which writes the only nationally accepted naturopathic board exams (Exhibit 40).

The Articles of Incorporation provide for representation of a number of professional associations. The American Association of Naturopathic physicians, the largest professional association, was active in helping to revitalize the CNME in 1985 and is represented on the Commission on Accreditation by Randall Bradley, N.D. of Nebraska. There are sitting representatives for the state associations of Arizona, Connecticut, Hawaii, Oregon, and Washington, the states with the largest numbers of licensed naturopathic physicians (see Exhibit 30, Members list). It has also received the support of associations in California, Minnesota, and Massachusetts (Exhibit 41) and applications from a number of other state associations.

There is an association, the American Naturopathic Medical Association (chartered in Nevada), which now opposes the Recognition of the CNME. (There is a second organization also known as the the American Naturopathic Medical Association which was chartered in California which has expressed no opposition to CNME Recognition (Exhibit 17h-1).) The ANMA (Nevada) has endorsed the standards of the CNME and had applied for a seat on the Council (Exhibits 42 and 43). The distinction to be made between these national organizations lies in the history of naturopathic medical education and licensing as explained previously. The American Association of Naturopathic Physicians is composed of naturopathic doctors licensed by various states and provinces, although it does have a few members who do not hold licenses who meet its membership criteria by other provisions. The American Naturopathic Medical Association, though it does have some licensed members, is composed mostly of unlicensed members and who may not be licensable, with their present educations, in any state. In the past year, standards have been developed for associations that may hold a seat on the Council and for Council members representing associations (Exhibits 17h-2, 17h-8, 17j-2, 17j-9, 17j-10, and 17j-14). This was done as a result of questions that arose with the application of the ANMA (Nev) and at the urging of Department of Education staff (Exhibit 44-9).

Some CNME members believe that it may be beneficial to provide an avenue for the input of practitioners, perhaps of long experience, who happened to be unlicensed, though members do recognize the potential threat to the integrity of standards and

the national recognition of the CNME that such input may entail. To provide this avenue of input but to protect against the potential threat, the standard adopted for associations was that all members of applying associations must be licensed or eligible for licensure (qualified to sit for licensing exams) according to the laws of Connecticut, Hawaii, Arizona, Oregon, Alaska, Florida, Washington, or Utah (Exhibit 17j-13). However, the ANMA (Nev) was exempted from this requirement, thus allowing a single vote on the Council to accommodate the feedback of the unlicensed fraction of those who refer to themselves as naturopaths. At this point, it came to the attention of the Council that at least one member of the ANMA (Nev) had presented a diploma from a school in Washington state that was not authorized to give the degree (Exhibit 17i-1), the Council asked that the association provide information on its membership screening process as well as information earlier requested on continuity (annual meeting minutes) and financial stability (budgets) (see Exhibit 27-3), the ANMA President, Don Hayhurst, refused. There then ensued a series of unsupported allegations from the ANMA against the Council and its operations and against the schools holding status with it. When documentation of the allegations were requested, none was presented (Exhibit 17j-3). The situation remains unresolved though the Council continues to try to maintain communications with the ANMA (Exhibit 27).

At the suggestion of the Executive Director of NASC, Washington state's Higher Education Coordinating Board has asked for and received the assistance of the Council in pursuing its responsibilities (Exhibit 48).

As indicated above, the policies of the CNME were derived in part from the standards of other recognized accrediting agencies, in particular, the Northwest Association of Schools and Colleges and the Council on Chiropractic Education. The NASC now allows institutions whose primary purpose is specialized education to be accredited by them if the accreditation is done in conjunction with a specialized accrediting agency. Accordingly, a joint site visit was completed recently by the CNME and NASC at Bastyr College (Exhibit 17h-5). Site visitors engaged by the CNME have often been educators who have also been engaged by the NASC for the same purpose. The present CNME Executive Director was located with the assistance of NASC Executive Director James Bemis.

The CNME continues to maintain lines of communication to recognized accrediting agencies. When the CNME's Department of Education Recognition has been stabilized, the Council has committed to pursuing membership in the Council on Postsecondary Accreditation (Exhibit 17g-3).

602.15 Resources.

The Secretary determines whether an accrediting agency has, and will be likely to have sufficient resources to carry out its accreditation function in light of its requested scope of recognition, including--

(a) Administrative staff and financial resources; and

Since its reactivation in 1985, the CNME has functioned continuously and reliably under the governing documents and with the resources it has needed to complete its assigned mission. The administrative duties of the Council are carried out by a salaried Executive Director. Since the CNME's reactivation, there have been two Executive Directors. The present one is Cecil Baxter, PhD. Dr. Baxter has extensive experience as a career educator and a continuing involvement with accreditation activities with recognized agencies (Exhibit 34). Dr. Baxter is assisted by the officers of the Council: the President, Carlo Calabrese, ND (see resume, Exhibit 32-1); the Vice-president, Joseph Pizzorno, ND (resume, Exhibit 32-16); the Secretary and also Secretary of the Commission on Accreditation, David Hinton, ND (Exhibit 32-3); the Treasurer, Jeff Klass, ND (Exhibit 32-13); the Chair of the Commission, Kathleen Shelly, PhD (Exhibit 32-19); and the Vice-chair of the Commission, Robin Moore, ND (Exhibit 32-14). The duties of each position are presented in the By-laws (Exhibit 49, pages 49-9 and 49-12).

Dr. Calabrese is the Dean of Clinical Education and Clinic director at National College of Naturopathic Medicine, coordinated the writing of several of NCNM's Self-studies and is the principle contributor to the writing of this Petition. He has been with the Council since 1985.

Dr. Pizzorno, the CNME Vice-president, is the President of Bastyr College and was one of the founding members of the CNME in 1978. He has led his College to Candidacy with the Northwest Association of Schools and Colleges, a first for a naturopathic college. He wrote the initial drafts of the Educational Standards and Accreditation Procedures. He is the editor of and a principle contributor to The Textbook of Natural Medicine.

Dr. Hinton, Secretary, has been a faculty member at two naturopathic colleges, has been in private practice for twelve years and is an active member of the Oregon Association of Naturopathic Physicians.

Dr. Klass, Treasurer, has been in practice for ten years and has been the chair of the American Association of Naturopathic Physicians' Legislative Committee.

Dr. Kathleen Shelly, Chair of the Commission on Accreditation,

has a PhD in Curriculum and Instruction and a MS in Educational Administration and has been a Clinical Professor at the University of Oregon.

Dr. Robin Moore, Vice-chair of the Commission, has been in practice for seven years and is the President of the Naturopathic Physicians Licensing Examination Board which administers nationally accepted exams for licensure in the various states and provinces.

In periods of increased activity, the Council has made expenditure for assistance for typing or accounting as needed. The presence of an attorney, James McConkey, JD, ND, on the Council at its reactivation was very helpful. The small number of applicant colleges available for accreditation and the resultant infrequency of review processes make the limited number of administrative positions acceptable for the present. Depending on the number of new naturopathic colleges this may need to change.

Beginning in 1985, the Council restructured its membership to eliminate conflicts of interest, published revised Education Standards three times to date, invited applications from colleges, arranged site evaluation visits and rendered decisions on the status of the applicants. It has entered its third review with the Department of Education in only three years. This has been a substantial undertaking with such a small staff and budget, but all tasks have been efficiently and professionally executed, and difficult decisions have been made in the best long-term interests of the colleges and the quality of naturopathic medical education.

Meetings are efficiently run by the President, the Executive Director and the Chair of the Commission with minutes taken by the Secretary with backup audio taping of most sessions. Extensive preparatory materials are mailed to members before each meeting (Exhibit 52). Quorums are easily achieved at all scheduled meetings. There is a shared sense of the importance of this work among members. Regular annual and semi-annual meetings have been held in conjunction with the annual conventions of the American Association of Naturopathic Physicians and the Northwest Naturopathic Physicians Association, the two largest associations of naturopathic physicians in the country. There have been donations of meeting facilities from both of the associations for each of the regular meetings held since 1986.

The CNME's financial resources have been derived from application fees, institutional and association membership dues, and donations. The financial needs of the CNME to carry out its operations are low due to the small number of institutions it must so far deal with. It is relatively easy to predict total costs associated with all accreditation activities that may occur in a given year. There is sufficient concern among members of the profession for the quality of naturopathic medical education

that members are eager to serve in the capacity of representatives of various professional associations. In general, the CNME operates under the principle that naturopathic professional members or their sponsoring associations bear their own expenses in regard to their Council activities unless this poses a serious hardship for a potential member who is exceptionally qualified in accreditation issues. Funding has never been reported as a factor in meeting attendance. This policy has been adopted without opposition, and while the policy must be reevaluated as the Council matures, there have been no difficulties so far associated with it. This is likely to be a reflection of the spirit of voluntarism that has existed historically in the profession. The Council bears the expenses of public members of the Commission on Accreditation.

Authority for professional association membership dues is contained in the Amendments to Articles of Incorporation, Fifth Article, section (b)(1) and (3) (Exhibit 4-2 and 4-3). These sections require member state associations to be "financially supportive" of the Council in proportion to the size of their membership. Dues are now set at \$10 per regular member of the represented association.

Applicant institutions bear the total costs of site evaluation visits, report preparation and reviews. Fees for accreditation activities and dues for are printed in Section II P. of the ESAP (Exhibit 11, page II-35). They have recently been raised as indicated in the minutes of April 22, 1989 (Exhibit 17L-8). While the present fee structure has proven sufficient to cover the operating and improvement costs of the Council, members recognize the need to generate additional funds for contingencies and for costs of gaining COPA recognition. These new fees will contribute to a budget surplus projected in 1990 (Exhibit 51).

Financial contingencies are already controlled to a degree by a recently adopted policy which states that, except for activities for which fees are already set, "all activities of the Council which entail costs such as membership applications, requests for evaluations, etc., be billed to the requesting parties at cost plus 20% payable in advance according to the estimate as given by the Executive Director (Exhibit 17j-7)." The Council also has the staunch support and resources of the American Association of Naturopathic Physicians to help channel donations in case of a shortfall. Several individuals, two companies, the Arizona Naturopathic Medical Association and the Federation of Naturopathic Medical Colleges have made donations. This support has occurred without the CNME making any concerted effort to raise funds through donations.

Recently there have been discussions of raising funds in order to apply for membership in the Council on Postsecondary Accreditation. The expenses of that effort are expected to be about \$20,000. Our sustaining expenses for COPA would thereafter be small as COPA dues are based on the number of schools accredited by the agency. The Council sees no particular

difficulty in being able to raise these funds as the entire naturopathic community sees the work of the Council as being of significant benefit. When Department of Education Recognition of the CNME has been stabilized, the Council will raise the funds and apply to COPA.

Budgets formulation is in the hands the Executive Director, the President, and the Treasurer with approval of major items and financial strategies by the full Council. A budget for the year 1989 is presented at Exhibit 50. The budget for 1989 is presented at Exhibit 50 and one for 1990 at Exhibit 51. Previous budgets were included with earlier Petitions. Financial reports are provided by the Treasurer to the members at most meetings of the Council (Exhibits 17m-6 and -7, 17j-15, 17h-7, 17g-1, 17f-1, 17d-1, 17c-1).

Audits are prepared by the accounting firm of Touche Ross (Portland office). The audit for the period ending April 30, 1987 is presented at Exhibit 53. The financial records for the ensuing two years are now in their hands and a copy of the audit will be forwarded to the AAEB when it is complete. A By-law amendment has been adopted which states that "an audit of the Council's financial records by an independent certified public accountant will be performed no less than every three years (Exhibit 17L-11)." Because of the small size of of budget the members felt that an audit every three would be sufficient. While the By-laws state that the officers of the Council may be elected to two successive terms of one year, our policy has been to elect a new Treasurer each year to help provide a safeguard against unauthorized use of funds in the interim between audits.

602.15

(b) Competent and knowledgeable personnel responsible for on-site evaluation, policy-making, and decisions regarding accreditation and preaccreditation status.

Site evaluation visits are carried out and reports on applicant institutions are written by qualified members of the naturopathic profession and the general educational community. Site visitors have been chosen by the Executive Director from recommendations by the CNME officers and directors and the staff of the Northwest Association of Schools and Colleges as well as from among his personal contacts in the educational field.

In 1986, three site evaluation visits were performed. At John Bastyr college, the site visitors were:

Russell DeRemer, PhD - Dr. DeRemer is the Dean of Students at Whitman College in Walla Walla, Washington and has done a number of site visits for the Northwest Association of Schools

and Colleges. He is a public member of the Commission on Accreditation. He served as the team chair and examined the areas of scholastic regulations, basic sciences curriculum, faculty and the library. (Resume at Exhibit 32-5.)

R. Ferris Kirkham, CPA - Mr. Kirkham is the President Emeritus of the LDS Business College in Salt Lake City, Utah and has done many site visits for the Northwest Association of Schools and Colleges. He examined the areas of institutional mission and objectives, organization, administration, and physical facilities.

Bruce Canvasser, ND - Dr. Canvasser is a 1977 graduate of National College of Naturopathic Medicine. He was at the time a member of the Oregon Board of Naturopathic Examiners and has been the Clinic Director and instructor in botanical medicine at NCNM. He is in private practice in Portland, Oregon. He examined the areas of clinical practice and curriculum, research, and continuing education.

There were two site visits in 1986 to National College. At the first, the visitors were Dr. DeRemer and Mr. Kirkham examining the same areas as they did at JBC and Robin Moore, ND, introduced above, who examined the areas of clinical practice, curriculum, research and continuing education. At the second site visit to NCNM, the visitors were:

Robert Broadwell, ND, OMD, DPH - Dr. Broadwell is a graduate of American Therapy University and has been in practice for 37 years in the Midwest, Oregon and California. He has been involved in naturopathic education since 1953 and is widely respected as one of the country's foremost practitioners of naturopathic medicine. He is currently engaged in research on Chinese botanical medicines in coronary artery disease and auto-immune diseases.

Richard Pahre, MA - Mr. Pahre received his graduate degree from the University of Iowa in personnel management and has additional post-graduate training in personnel, counseling, and student services. He was Assistant Dean of Men at Oregon State University from 1956-66, Director of Financial Aid from 1966-86, and a full professor at OSU's School of Education. He was an officer of the National Association of Student Financial Aid Administrators and has been involved in accreditation at OSU.

In 1989, there was one visit at Bastyr and one at National. At Bastyr, in a joint visit with the Northwest Association of Schools and Colleges, the CNME was asked to provide visitors to cover naturopathic medicine, botanical medicine, Oriental medicine, homeopathic medicine and natural childbirth and midwifery (Exhibit 17h-5). The visitors were:

Randall Bradley, ND, the CNME visit chair, is a 1982 graduate

of National College, the AANP representative to the Council, and a member of the AANP Board of Directors. He is in private practice in Lincoln, Nebraska and has been working with Nebraska legislators on licensure issues.

Malvin Finkelstein, L.Ac., Dipl.Ac., is a graduate of the New England School of Acupuncture, a member of the advisory committee on acupuncture to the Oregon Board of Medical Examiners, and a Trustee of the Oregon College of Oriental Medicine. He has been in the private practice of acupuncture and Chinese medicine since 1978.

Henry Merritt, MD, ND, PhD of Jacksonville, Florida has been a practitioner since 1945 and is licensed in four states. His PhD is in psychology. He has been a director of drug rehabilitation for the U.S. Navy and has been a teacher at several colleges.

At National College, the visitors were Dr. Merritt, Dr. DeRemer and

Don Millage, CPA, the Vice-president for Financial Affairs at George Fox College in Newberg, Oregon. Mr. Millage was in practice for fifteen years with a national accounting firm and has been in his present position for eighteen years. He has done a dozen site visits for the Northwest Association, usually dealing with schools that were having financial problems.

Ex-officio members at various site visits have included the Executive Directors, Cecil Baxter and James Moore, and the Chair of the Commission on Accreditation, Kathleen Shelly.

All decisions on accreditation status are made by the Commission on Accreditation which includes all members except the Institutional members. Policy-making and standards-setting is in the hands of the entire Council. Other members not mentioned above are Konrad Kail, ND, PA-C (Exhibit 32-7), of Scottsdale, Arizona representing the Arizona Naturopathic Medical Association and Julie Dickens, ND of Wailuku, Hawaii of the Hawaii Society of Naturopathic Physicians (Members list, Exhibit 30).

Two on-going committees have been established. The Membership Committee is composed of the public members and Robin Moore. They screen the applications of new associations and members and give recommendations on these matters to the Council. The Liaison Committee was originally formed to coordinate standards with licensing boards and the NPLEX Board. It has been more recently playing a key role in the Council's review of standards for validity (Exhibit 17m-2). There have also been ad hoc committees such as an Executive Director search committee and an Advanced Standing committee formed for short term needs.

Last year the Council adopted guidelines for professional members (Exhibit 17j-9). Public members have been elected from nominations of the membership with more of an eye to experience in education or accreditation than for the physician members. This has been a conscious effort in order to attain some balance of focus on the process versus the content of profesisonal education.

602.16 Integrity of process.

The Secretary determines whether an accrediting agency adheres to the following practices and procedures in making its determinations concerning accreditation and preaccreditation status:

- (a) As an integral part of its accrediting activity, it--
(1) Requires self-analysis by each subject educational institution or program in accordance with guidance provided by the agency; and

The Educational Standards and Accreditation Procedures call for the submission of a self-study by the institution in paragraph 2. under Section II B. "Process for Seeking Candidate Status or Accreditation (Exhibit 11, page II-6). Guidance for the process is contained in Section II C. "The Self-study" (pages II-8 to II-13) and "consultation services are available from the Commission (page II-6)." The Executive Director is also available for consultation. Handling of the Self-study after its submission is described in Section II D. (page II-14).

Copies of the Self-studies of the two institutions holding status with the Council are presented as Exhibits 18 and 19.

There have recently been several changes in the guidelines for self-studies presented in Exhibit 17L-3 to -5.

602.16 (a)

(2) Conducts an on-site review of the institution or program, conducts its own independent analyses and evaluations of the data furnished by the institution or program, and provides a written report on the review to the institution or program concerning--

- (i) The strengths and weaknesses of the institution or program (both at the main campus and branch campus or off-campus locations), including areas needing improvement; and
(ii) The institution's or program's performance respecting the assessment of student achievement as described in 602.17.

Site visits are called for in Section II B. (page II-6) with directions in Sections II E., "Preparation by the Institution for the On-site Examination (pages II-15 and II-16)," Section II F., "Preparation of the Site Visit Team (page II-17)," and Section II G., "The Site Visit Report (page II-18)." There are recent amendments regarding site visits and reports at Exhibit 17L-5 and 17L-6).

Besides the site visitors described in the response to Section 602.15 of the Secretary's Criteria, the Executive Director has been available at each of the site visits done by the Commission on Accreditation.

After each site visit, the Commission has considered the findings of the site teams. The site team chair has been present for each consideration of findings except for the NCNM visit of April 1989 when the Executive Director presented team recommendations.

Sample site visit reports are presented as Exhibits 20 and 21. The reports contain indications of the strengths (e.g., Exhibit 20-10, -11, -15 [sec. II], -16 [sec. IV, V], -17 [sec. VII], etc.; Exhibit 21-11, -14 [sec. I, II], -21 [sec. X, VII], etc.) and weaknesses (e.g., Exhibit 20-4 [sec. D], -8 [para. on Faculty Non-teaching functions], -15 [sec. III], -22 [sec. XV], etc.; Exhibit 21-4 [sec. C], -8 [sec. H], -15, -17 [para. 3], -21, etc.) of the institutions. Recommendations for improvements are also included (e.g., Exhibit 20-10, -16 [sec. III], -18 [sec. VIII], etc.; Exhibit 21-10, -16, -17, -23, etc.).

Directions for preparation of the reports has recently been amended to specifically require commentary on strengths and weaknesses (Exhibit 17L-6). However, it is clear that teams have always followed this guideline. An amendment to the ESAP has also been adopted that "the report will address specifically the institution's performance in respect to the assessment of student achievement in relation to the educational effectiveness of the program (Exhibit 17L-6)." When this requirement is employed in conjunction with other amendments and requirements described in the response to Section 602.17, it will provide clear guidelines to the site visitors on what is needed in this regard. While no visits were done after these amendments were adopted, reports have addressed these aspects areas (e.g., Exhibit 20-6 [Assessment], -19 and -20 [sec XI], -22 [sec. XV]; Exhibit 21-6 [Grading], -7 [Clinic Evaluation], -23 [para. 6].

602.16

(b) It re-evaluates at reasonable intervals the institutions or programs to which it has granted accreditation or preaccreditation status.

Institutions and programs may be granted accreditation for a period of up to five years. If the Commission finds that there are areas of weakness, recommendations may be tied to a timetable for correction or the institution may be asked to report its progress at specified times. The institution is expected to engage in continuing self-study and improvement. (Exhibit 11, page II-21).

Candidates for Accreditation may hold that status for up to six years with reinspection and reevaluation every two years (page II-20).

Annual progress reports are required of all member institutions in the interval between evaluations to allow for continuous monitoring. The content of the report is described in Section II J. (page II-31; Exhibit 17L-7, revision; Exhibit 60, sample reports).

602.16

(c) It bases its decisions regarding the award of accreditation or preaccreditation status upon its published criteria and provides advance public notice of proposed new or revised criteria, providing interested parties adequate opportunity to comment on such proposals prior to their adoption.

The Commission determines whether or not "the institution appears to be adequately organized, staffed, and supported to offer the educational programs and services as announced in the catalog in order to meet its stated purposes and the CNME's current published standards (Exhibit 11, page II-19 and Exhibit 17L-6)."

While the possibility of accreditation by the CNME has been extended to all known institutions which may be eligible (Exhibit 24, Circulation list, and Exhibit 45, Sample letters), the ESAP states that "Accreditation by the Commission means that the naturopathic institution's goals are clearly stated and conceived, that its educational program has been well designed and meets essentially all of the educational standards of the CNME, that its purposes are being accomplished, and that the program is adequately organized, staffed and supported so that it should continue to merit such confidence (page I-7)."

Accordingly it has granted Accreditation only to Bastyr College and Candidacy to National College. In its first review of National, it denied Candidacy, a decision based on excessive institutional debt at the time of the review (Exhibit 17c-6). After reducing its debt, receiving an unqualified audit, developing plans for dealing with remaining debt, and obtaining an independent evaluation as to the potential of refinancing its first mortgage, National was granted Candidacy (Exhibit 17e) which meant that it had the potential for meeting Council standards within six years. The decision on Bastyr's first review was deferred until better controls on accounting practices and faculty involvement were developed (Exhibit 17c-6, 17f-3).

Pursuant to a precedent established in 1986 (Exhibit 17d-2), the Council adopted a change in its By-laws in 1987 which states: "Standards and rules shall not be changed without due notice to and adequate opportunity to comment by all persons, institutions,

and organizations significantly affected by the Council's accreditation activities (Exhibit 17g-10)." The Council has completed two standards revisions under the precedent established in 1986. It has distributed the substance of these changes to all parties that have an interest in the work of the Council (Exhibit 54), allowed one month or two months for comments and considered the comments received before amending and adopting the changes. General meetings of the Council are open to the public and comments and suggestions are actively solicited. Most meetings of the Council are arranged to coincide in time and place with naturopathic professional meetings, allowing access by the parties most interested in the educational standards.

602.16

(d) With regard to the award of preaccreditation status, it applies criteria and follows procedures that are appropriately related to those used to award accreditation status.

Descriptions of the categories of accreditation and pre-accreditation appear first in the Articles of Incorporation (Exhibit 4-2). Further description and procedures followed for granting or reaffirming, denying, revoking, and reinstating the statuses of Accredited and Recognized Candidate for Accreditation appear in Section II of the ESAP (Exhibit 11). Policies related specifically to Candidacy are found on pages I-7, II-3, II-5, II-6, II-8, II-19, II-19, II-20, II-33, and II-35. Candidates must show evidence of being able to comply with the standards within six years and may remain in Candidacy status for that length of time.

602.16

(e) It offers appropriate and fair written procedures for appeals of its denial or withdrawal of accreditation or preaccreditation status. Such written procedures shall be made promptly available to the chief executive official of any institution or program affected by such a change in status.

The "Appeals Policy and Procedure" is in Section II J. of the ESAP (Exhibit 11, page II-24). Adverse action of the Commission may be appealed within thirty days of notice of the action to the President of the Council. Upon appeal, the prior status of the institution, if any, is restored pending disposition of the appeal. The President appoints a five member Appeal Board with a designated Chair. No Appeal Board member may

be a current Commission member or site visitor at the institution. The possibility of appeal and notice of the procedure is to be made available to the CEO of the institution in the report of the adverse decision to the institution (Exhibit 17L-7).

There have been no appeals of adverse Commission actions in the Council's history.

602.16

(f) It maintains a written policy under which it notifies the Secretary within 30 days of any final decision--

- (1) To withdraw accreditation or preaccreditation status from an institution or program; or
- (2) To place an accredited or preaccredited institution or program on a publicly announced probationary status.

A statement reflecting this new requirement of the Secretary of Education's Criteria has been adopted for the new edition of the ESAP: "Withdrawal of accreditation or Candidacy or the placing of an institution or program on public probation will be reported to the U.S. Secretary of Education by the Executive Director of the CNME within 30 days of a final decision by the Commission or, if there is an appeal, within 30 days of the completion of the appeals process (Exhibit 17L-6)."

602.16

(g) Its organization, functions, and procedures include effective controls against conflicts of interest and against inconsistent application of its criteria and standards.

In the effort to assure that standards and procedures are fairly applied, at its reactivation in 1985, the Council membership was divided into two classes, Institutional Members and the Commission of Accreditation. All accreditation decisions are made by the Commission which includes no college representatives (Exhibit 11, page I-3, Exhibit 4-1 and -2). Given the currently small population of naturopathic colleges, it was considered wise to reduce the possibility of conflicts of interest which might arise due to a perception of competition for, say, donors, research contracts, or students or due to differences in institutional philosophy. The Commission is composed of representatives of the naturopathic profession and public members. Organizations appointing representatives are encouraged, as much as practicable, to avoid appointing more than

one person who holds a degree from a particular institution (Exhibit 49-3, Sec. 3 (e)).

The Council adopted in 1987 a conflict of interest policy which states:

1. All decisions of the Commission on Accreditation of the Council on Naturopathic Medical Education are to be made solely on the basis of a desire to promote the best interests of the public and of naturopathic medical education in the United States. It is therefore the policy of the Commission that:

If the Commission is called upon to consider any matter related to accreditation of an institution of naturopathic medicine and a member of the Commission is affiliated with that institution, then that member, prior to the Commission's consideration of that institution shall:

- a. disclose fully the precise nature of his or her interest or involvement in that institution; and
- b. refrain from participation in the Commission's consideration of that institution.

For the purposes of this conflict of interest policy, a Commission member is "affiliated" with an institution if he or she, or a member of his or her immediate family (spouse, parent, children, brothers, sisters):

- a. is or was within the past two years an officer, director, trustee or employee of such institution; or
- b. is or was within the past four years a student, applicant for admission, or graduate of such institution; or
- c. has any other direct or indirect dealings with that institution from which he or she knowingly is materially benefitted (i.e., receives directly or indirectly cash or other property in excess of \$500 in any year).

2. No member of a site visit team:

- a. may be affiliated with or a graduate of the institution being visited; or
- b. may be affiliated with an institution which competes for students with the institution being visited.

(Exhibit 17g-10)

The Commission has provision for two public members. The Articles of Incorporation state: "Two members of the Commission on Accreditation shall not be naturopathic physicians or on the faculty or board of a college of naturopathic medicine and shall represent the general public (Exhibit 4-3)....Public members

shall not have been affiliated at any time with a past or current institution of naturopathic medicine, and should bring experience, perspective or expertise to the Commission which is valuable to the Commission as it considers accreditation policies and decisions (Exhibit 17g-10)." They are, of course, subject to the policy above. Another recent By-laws change prevents them from serving more than two terms of three years in order to keep them from forming too close an identification with the interests of the profession (Exhibit 17L-11).

There is a requirement that at least one of the site visitors of the three member minimum team be unaffiliated with the CNME (Exhibit 11, page II-6). All site visits to date have included two participants unaffiliated with the CNME. An institution has the right to challenge the appointments of up to two site visitors who will then be replaced (Exhibit 11, page II-15). Opportunity is given to the institution to respond to the facts and conclusions of site visit reports before it is forwarded to the Commission (Exhibit 11, page II-18).

The Council maintains clear procedures and standards which were constructed in a public process. These standards are widely distributed. Meetings of the Council are open to the public and input is solicited from interested parties. There is open communication with institutions affected of evaluations and actions with specifics on which decisions are based. Actions which are not in accord with its written policies may be brought to the attention of the Council. The time and place of regular meetings are set at the previous meeting. All members entitled to vote must be notified of non-regular meetings (Exhibit 49, Art. II, Sec. 5) at least ten days in advance and if the agenda contains intended changes in the Articles of Incorporation or By-laws, that fact must be noted in advance (Art. II, Sec. 7.).

There is a written appeal process which calls for no change in previously held status pending outcome of the appeal. The appeals process calls for a board composed only of persons unaffiliated with the CNME.

Finally, an additional mechanism of ensuring that standards are consistency applied is the use of a worksheet in the evaluations of institutions which causes each recommendation and requirement of Council standards to be evaluated (Exhibit 55). /

602.16

(h) If the institution or program elects to make public disclosure of its status, it requires that each institution or program to which it has granted accreditation or preaccreditation status disclose that status accurately, including the academic or instructional programs covered by that status.

The requirement on publication of status in Section II N. of the ESAP is:

In publishing notice of accreditation status, the institution must clearly indicate whether it is the program or the institution which has been granted accreditation or candidacy by the CNME. The institution or program recognized as a Candidate for Accreditation must only use the prescribed official definition for Candidate for Accreditation in all official publications and correspondence, i.e., "(Name of Institution or Program) has been granted Candidate for Accreditation status by the Council on Naturopathic Medical Education. Candidacy is not accreditation nor does it assure eventual accreditation. Candidate for Accreditation is a status of affiliation with the CNME which indicates that the institution (or program) has achieved initial recognition and is progressing toward accreditation." (Exhibit 11, page II-33, Exhibit 17L-8).

602.16

(i) It maintains a systematic program of review designed to assess the validity and reliability of its criteria, procedures, and standards relating to its accrediting and preaccrediting activity and their relevance to the educational and training needs of affected students.

The Council members consider issues of validity and reliability and those of educational outcomes to be of central importance at this stage of the agency's maturation. To codify some of these concerns it incorporated, in 1987, the following passage into its By-laws:

Standards of the Council are to be valid in that an independent observer of an accredited institution may infer high quality in the institution or program by virtue of its compliance with the standards. They are to be applied consistently and with minimal error to applicant and member institutions. Avenues of appeal by an aggrieved institution shall be maintained. Standards and procedures shall be regularly and systematically reviewed by the Council or a

committee appointed by it so as to ascertain their continuing validity and reliability. (Exhibit 17g-10)

The standards and procedures document of the CNME has been reviewed by members three times since 1985 for error, ambiguity, non-compliance with Department of Education criteria, redundancy, omission, or inadequacy. Necessary changes thus identified have entered the process for amendment described under Section (c) of this Criterion.

The achievement of validity of standards implies a consensus among experts and professionals as to what the standards should be. For exploration of needs in this area, a Liaison Committee on parallelism among standards of naturopathic professional organizations was formed (Exhibit 17g-3) to facilitate communication among the CNME, state licensing boards, the Naturopathic Physicians Licensing Examination Board (NPLEX), naturopathic specialty groups and the academic and research departments of the colleges. A report is in preparation on a strategy for approaching the validity question.

Among documents recently collected in preparation for the design of a validity review are a Job Task Analysis done for NPLEX by a test writing corporation (ACSI - National Assessment Institute) (Exhibit 56), a survey of practice trends done by David McMullan of National College (Exhibit 57), Standards of Practice of the Arizona Naturopathic Medical Association (Exhibit 58), and a research proposal on evaluating health care outcomes of naturopathic medicine (Exhibit 59). A letter is being prepared to request information on the distribution of types of complaints to licensing boards.

New requirements for the schools to provide information on educational outcomes will, in the long run, provide vital information for validity reviews.

Ultimately, the question to answer in regard to validity is: what must naturopathic educational institutions do to ensure the best health care outcomes in the practices of their graduates? Relatively little substantive work of this nature has been done even among health care professions with vastly more resources. Daunting as the task is, the profession is not ignoring it.

In the area of reliability, the Council has compared its evaluations of colleges with those of the Northwest Association of Schools and Colleges and state agencies. Both schools now holding status with the CNME are also under the review of other agencies. This has allowed the Council to compare its performance against that of more experienced organizations. The two colleges have been reviewed by the Northwest Association of Schools and Colleges (both schools), the Oregon Office of Educational Policy and Planning (NCNM), the Oregon Board of Naturopathic Examiners (both), The Washington Higher Education Coordinating Board, and the Washington state licensing board

(both). At the several opportunities that it has had to compare evaluations, agency reports have indicated similar areas of concern. The Council will continue to make these comparisons as an external check on its processes.

The three DEAE reviews have provided a measure of automaticity to the standards review process. While the Council cannot rely on this mechanism in the long run, its efforts to achieve and maintain Recognition, and the penetrating examination by the Department, has been most salutary. Perhaps just as valuable for the future, the Council has made the resolution to pursue membership with the Council on Postsecondary Accreditation (Exhibit 17g-3). Contacts have been made with COPA to this end.

602.16

(j) It maintains complete and accurate records of its last two reviews of each institution or program, and accurate permanent records of its decisions with respect to preaccreditation, accreditation, and adverse actions.

Since 1985, the Council has kept complete records of all reviews, in fire resistant file cabinets. Many of these records are duplicated on computer media and have also been distributed to Council members and provided to the Department of Education. There are records of all decisions made by the Commission dating back to the Council's founding in 1978.

602.17 Focus on educational effectiveness.

The Secretary determines whether an accrediting agency, in making its accrediting decisions, systematically obtains and considers substantial and accurate information on the educational effectiveness of postsecondary educational institutions or programs, especially as measured by student achievement, by--

(a) Determining whether an educational institution or program maintains clearly specified educational objectives consistent with its mission and appropriate in light of the degrees or certificates it awards;

In several passages, which have recently been revised, the Council requires that applicant institutions maintain specified educational objectives. On page II-3 of the ESAP (Exhibit 11), one of the Eligibility Standards requires that the institution "has a statement of mission and objectives adopted by the administration and governing board which demonstrates that its purposes are appropriate to the preparation and training of naturopathic physicians (see also Exhibit 17L-2)." The self study data are to include a definition of the institution's mission and documentation of the level of achievement of the institutional mission and educational effectiveness (Exhibit 11, page II-9, Exhibit 17L-4). The Instructional Program description must present the requirements for the degree (Exhibit 11, page II-12). Scholastic regulations must assure that candidates for graduation must demonstrate "educational achievement appropriate to patient care (Exhibit 17L-9)." The catalog of the college must contain adequate information on grades, promotion and graduation requirements. This must encompass the primary care responsibilities of diagnosis and naturopathic treatment. The recent revision of the ESAP now requires that the catalog of the institution "shall include the program's educational objectives (Exhibit 17L-8).

The site visit worksheet (Exhibit 55) reminds team members to examine the area of objectives (page 2, item 4; page 3, item A.; page 4, item C., D., E.). No site visits have yet been done under our recently revised standards and the worksheet has not yet been revised to reflect them.

The presence of appropriate educational objectives are addressed in site visit reports (e.g., Exhibit 20-3, -5, -6 and Exhibit 21-4, -6, -7, -19, -20) though the dominance of the central educational mission of programs with status with this specialized accreditation agency, to produce competent naturopathic clinicians, is so obvious that it need not necessarily be pointed out by site visitors. Similarly, the time of the team is not to be spent on lengthy descriptions of functions which are operating "normally and in a conventional manner" as long as they meet Council criteria, rather, they are to focus on what distinguishes

the institution (Exhibit 11, page II-18), whether positive or negative. Precisely how the general objective of preparing a competent naturopathic physician is reached is, of course, a matter of continuous development as is indicated in the discussion of the validity of standards.

602.17

(b) Verifying that satisfaction of certificate and degree requirements by all students, including students admitted on the basis of ability to benefit, is reasonably documented and that the standards conform with commonly accepted standards for the preparation of certificates and degrees involved, and that institutions confer degrees only on those students who have demonstrated education achievement as assessed and documented through appropriate measures;

The ESAP states that "The candidate for graduation must have completed the prescribed curriculum of the college, met all its regulations, and demonstrated educational achievement appropriate to patient care as assessed and documented through verifiable and consistently applied academic and clinical measures before a degree is granted (Exhibit 11, page II-9; Exhibit 17L-9)."

The site visit worksheet serves to remind team members that satisfaction of requirements is documented (Exhibit 17L-9 [Record keeping], -4 [Graduation requirements], -6 [Clinical records and documents]).

The central educational objective of training competent naturopathic physicians and its related scholastic achievements are reflected in site visit reports (e.g., Exhibit 20-5 [para. D.] ["Assessment"], -7 [under "Clinical Staff"], -22 and -23 ["Admissions"], -6 ["Grading, Promotion and Graduation"] [Clinic Evaluation System], -14, -20, -21 [5] Student records, etc.). Since there are only two schools holding site visits, each had more than one visit and since the Procedure Manual requires the return of one visitor who has been on a previous visit (Exhibit 11, page II-6), once the adequacy of various standards was established, visitors at repeat visits tend to focus on areas that have changed significantly while keeping an eye on possible deterioration.

602.17

(c) Determining that institutions or programs document the educational achievements of their students, including those admitted on the basis of ability to benefit, in verifiable and consistent ways, such as evaluation of senior theses;

student portfolios, general educational assessments (e.g., standardized test results, graduate or professional school placements), job placement rates, licensing examination results, employer evaluations, and other recognized measures;

The ESAP, in its description of the self study proces, indicates the it is to "start with institutional objectives and penetrate every facet of policy, program, procedure, and personnel in terms of those objectives. Its scope must be quantitative and qualitative...(Exhibit 11, page II-6)." Given the underlying requirement that institutional objectives must be appropriate to the preparation and training of naturopathic physicians, the self study must demonstrate that the institution is accomplishing this specialized mission. The required nature of self study data is expressed in the opening sentence of the newly revised section on the data:

Self-study Data

The following list is indicative of at least some of the data which is to be included and analyzed in the self-study....

-
- 1. d. Documentation of the level of achievement of the institutional mission and educational effectiveness in quantifiable terms, such as the number of graduates, performance on licensing exams, number licensed, number in practice or in professionally related occupations, etc.
-
- 3. b. Results of standardized tests and other measures of student achievement.

(page II-9 and Exhibit 17L-9)

The site visit worksheet reminds team members to check graduation requirements and that a grading system exists differentiating levels of performance as in required in the ESAP. Clinical training must have similar evaluation processes to the lecture portions of the curriculum.

The Council indicates that one of the obligations of the institutional governing board is "To develop goals, objectives, and policies for the college, and to ensure its efectiveness in serving the students, the profession, and society (Exhibit 11, page III-4)."

The colleges that have been evaluated by the CNME have each done a survey of graduates to determine practice character, perceived weaknesses and strengths in their educations, career satisfaction, income, etc. (e.g., Exhibit 57.) The data obtained in this Exhibit are separable by institution from which respondents graduated.).

Opportunities are arising as the profession develops to gain valuable feedback on the educational process. The Naturopathic Physicians Licensing Examination Board (NPLEX) has developed a

standardized licensing exam, in conjunction with national professional testing firms, which is replacing the separate state examinations. Tracking grades on graduates on this test will, over the years, offer a means of evaluating evolving curricula. Some indications have already emerged of areas that need to be reinforced, such as minor surgery. The activities of our Liaison Committee and the presence on the Council of the President of NPLEX and representatives of licensing boards ensures that this information will be brought to the attention of members. Intraprofessional organizations are developing such as the American college of Naturopathic Obstetricians, the Homeopathic Academy of Naturopathic Physicians, and the American College of Naturopathic Acupuncturists which are establishing standards in their respective areas and in which membership of graduates would be significant.

Since students in these schools are being trained in a clinical discipline, an evaluation of clinical outcomes and patient satisfaction would be the ideal endpoint determination for educational outputs. Progress is being made in this direction (Exhibit 59). Clinical ~~outcomes~~, however, are the holy grail of medical record keeping systems. In addition, evaluation of this sort, say in graduates' offices, may be too far removed (with too many intervening variables) to be of real use in the refinement of the educational process. A more purely educational outcome, such as a skills assessment (e.g., can an advanced student take an adequate medical history, do a physical exam, or apply a range of naturopathic treatments for asthma?) is simpler to evaluate, and this is already being done through course outlines, grades, and clinical requirements. Further elaboration of requirements on outcome measurement is likely to remain a feature of the cyclical review of CNME standards and procedures.

602.17

(d) Determining that institutions or programs admitting students on the basis of ability to benefit employ appropriate methods, such as preadmissions testing or evaluations, for determining that such students are in fact capable of benefitting from the training or education offered;

Until recently, the Council has maintained no particular standards for the admission of students on the basis of ability to benefit. It has revised a statement that added to its former requirement that the self study cover the "Ability level of entering students as measured by pre-professional college record (Exhibit 11, page II-10)" and the further statement that "for students admitted on the basis of ability to benefit, pre-admissions testing and evaluation (Exhibit 17L-4)" must also be covered. It has always required that no student be admitted without a review of psychological, moral and professional attitudes by a committee, and that s/he must furnish proof of having at least three years of course work (90 semester) leading

to a baccalaureate degree at an accredited institution (page III-8). There are further requirements for admissions with advanced standing.

Neither member institution has an "ability to benefit" policy.

602.17

(e) Determining the extent to which institutions or programs broadly and accurately publicize, particularly in representations directed to prospective students, the objectives described in paragraph (a) of this section, the assessment measure described in paragraph (c) of this section, the information obtained through those measures, and the methods described in paragraph (d) of this section; and

While the Council and its Commission have not in the past determined the extent to which institutions publicized assessment measures and results, it now requires in a paragraph entitled "Public Disclosure" that

The college shall make available to the public, and especially to prospective students, information regarding the program's educational effectiveness to include the number of graduates and graduation rates, graduates' performance on licensing examinations, and the number of recent graduates in practice or in professionally related occupations.
(Exhibit 17L-8)

It now also requires that educational objectives be indicated in the catalog (Exhibit 17L-8).

602.17

(f) determining the extent to which institutions or programs systematically apply the information obtained through the measures described in paragraph (c) of this section toward steps to foster enhanced student achievement with respect to the degrees or certificates offered by the institution or program.

In accordance with this Criterion, the Council now requires that, under the section of the self study on "Control and Administration," that the institution describe "processes by which the results of measures of educational effectiveness are systematically applied to foster enhanced student achievement (Exhibit 17L-4). This requirement has not yet been applied in an evaluation.

602.18 Regard for adequate and accurate public disclosure.

The Secretary determines whether an accrediting agency in making its decisions, reviews elements of institutional or program integrity as demonstrated by the adequacy and accuracy of disclosures of information that do not mislead the public (and especially prospective students) as to--

(a) The institution's or program's resources, admission policies and standards, academic offerings, policies with respect to satisfactory academic progress, fees and other charges, refund policies, and graduation rates and requirements;

The Council's standards (Exhibit 11, page III-7) require that the institution publish in a bulletin, which must be issued at least biannually, information on:

1) Resources: the administrative officers, members of the faculty with their credentials, and descriptions of the library, laboratories, clinic facilities and other learning resources (see also Exhibit 17L-8);

2) Entrance requirements;

3) Academic offerings: the character of the courses and programs, course descriptions and course credit hours;

4) Academic progress policies: grading, discipline, attendance, and promotion requirements;

5) Fees and refunds: tuition, matriculation, laboratory, graduation and special fees with an explicit statement of tuition refund policy;

and

6) Graduation requirements.

Institutions must also make available, "especially to prospective students," graduation rates (Exhibit 17L-8 and -9).

Site visit team members are reminded to check for this information in the institution's catalog through the site visit worksheet (Exhibit 55-3 and -4). As noted previously, the site visit worksheet has not yet been revised to cover recent revisions of requirements as no site visits have yet been done under the revisions.

602.18

(b) The institution's or program's educational effectiveness as described in 602.17;

The recent revisions include a statement that the catalog must include a description of the program's educational objectives. In separate paragraph in the ESAP, under the heading "Public Disclosure," is the following:

The college shall make available to the public, and especially to prospective students, information regarding measures of the program's educational effectiveness to include the number of graduates and graduation rates, graduates' performance on licensing examinations, and the number of recent graduates in practice or in professionally related occupations. (Exhibit 17L-8 and -9)

It must be noted that no evaluations have been done by the Commission while this requirement was in place.

602.18

(c) Employment of recent alumni related to the education or training offered, in the case of an institution or program offering training to prepare students for gainful employment in a recognized occupation, or where the institution or program makes claims about the rate or type of employment of graduates; and

See response to section (b) of this Criterion.

602.18

(d) Data supporting any quantitative claims made by the institution with respect to any matters described in paragraphs (a), (b), and (c) of this section.

Since the requirements indicated in the response to section (b) of this Criterion are in regard to the "measures of educational effectiveness," the data supporting claims made is to be provided by the institution.

602.19 Regard for decisions of states and other accrediting agencies.

The Secretary determines whether an accrediting agency, in making its decisions, shows regard for the decisions of States and of other recognized accrediting agencies by conforming with the following practices:

(a) Recognizing only those institutions or programs that are legally authorized under applicable State law to provide a program of education beyond secondary education.

One of the General Eligibility Standards for Council status is that the institution "has formal authority from the appropriate state governmental agency to grant an N.D. or N.M.D. degree... (Exhibit 11, page II-3)."

Bastyr College has its authorization to grant the N.D. degree from Washington state's Higher Education Coordinating Board. National College is authorized to grant the N.D. degree by Oregon's Office of Educational Policy and Planning.

602.19

(b) In considering whether to grant initial accreditation or preaccreditation status to an institution or program, taking into account actions by other recognized agencies which have denied accreditation or preaccreditation status to the institution or program, have placed the institution or program on public probationary status, or have revoked the accreditation or preaccreditation status of the institution or program.

An applicant institution is required to indicate in its self study "Accrediting agencies which have accredited or granted candidacy to or denied or revoked accreditation or candidacy or placed on public probation the naturopathic degree program or institution, and date of accreditation or most recent reaccreditation (Exhibit 11, page II-12 and Exhibit 17L-4)." Applicants must also provide at the site visit copies of the "reports of most recent evaluations received from other accrediting and state educational agencies" and "most recent reports submitted to other accrediting and state educational agencies." (Exhibit 11, page II-15 and Exhibit 17L-5)

602.19

(c) If another recognized agency places an institution or the principal program offered by an institution on public probationary status or revokes the accreditation of the institution or principal program within an institution, promptly reviewing the accreditation or preaccreditation status it has previously granted to that institution to determine if there is cause for it to withdraw or otherwise alter that status.

Under Section II L., "Re-evaluation and Duration of Status," a recent addition states:

If another recognized accrediting agency places the institution or program on public probation or removes its accreditation or candidacy, a review of the CNME status will be undertaken by a committee of three Commission members appointed by the Chair of the Commission. The review will take place within 90 days or by the next meeting of the Commission, whichever is longer, and will culminate in a recommendation to the full Commission on whether or not there is cause to alter or withdraw the status granted by the Commission. If the recommendation is to alter or withdraw status, the Commission will vote on this recommendation and its decision will be transmitted, along with a bill of particulars, within seven days to the chief administrative officer of the institution. (Exhibit 17L-7)