

Summary of Public Comments and ACHENA Deliberations

Eligibility and Initial Curriculum Review Standards

Released: November 19, 2014

Background

On September 18th, 2014 ACHENA published revised *Eligibility and Initial Curriculum Review Standards* for a 30 day public comment period. A total of 9 commenters submitted comments totaling 10 pages in length. Five of the comments were submitted by school owners or administrators, all of which also serve as faculty. The other four comments were submitted by individuals who are either current or former faculty or instructors at schools of homeopathy. Seven commenters expressed support for the revised standards with comments expressing appreciation of ACHENA's efforts to reduce costs and streamline the process while still ensuring that standards are within generally accepted practices of accrediting bodies. Three of these commenters also expressed the opinion that the eligibility standards were reasonable, needed and important for the growth of the profession. The areas of the standards that drew the most comments were: Standard 1, regarding legal authorization to offer educational programs; Standard 10, regarding physical facilities and learning resources; and Standard 13 regarding availability of student services.

A committee of three ACHENA commissioners reviewed the public comments and made recommendations to the full commission for consideration. Several significant changes were made to the standards as a result of the public comment process. The full commission voted unanimously to accept the November 19th draft of the eligibility standards as final.

Listed below is a summary of points made by commenters and ACHENA's response.

| | Comment | ACHENA Deliberation |
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| 1 | Three commenters commended ACHENA for streamlining the eligibility standards, indicating that the standards seemed reasonable, comprehensive and suggested no significant revisions. | ACHENA appreciates positive comments on our efforts to improve our accreditation processes. |
| 2 | Four commenters expressed concern about Standard 1 which requests school to <i>"provide evidence that the homeopathic educational program is located in a legally recognized educational institution which is authorized by an appropriate agency"</i> . One commenter expressed that the standard should clearly define "legally recognized" and "appropriate agency". One commenter who has authorization from the state in which their homeopathic educational program resides, stated that the ACHENA standards were less | U.S. Codes and Federal Regulations (CFR) 34, Part 602, Subparts B and C outline the federal regulations regarding recognition of accrediting bodies by the US Department of Education (DOE). These are the regulations that ACHENA must comply with in order to achieve federal recognition as an accrediting body, which is ACHENA's stated goal. These regulations define very broadly those entities that would be eligible for accreditation by a US DOE recognized accrediting body. CFR 602.28 (a) states that accrediting bodies shall |

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| <p>demanding than her state’s requirements. One commenter stated, “While the Note to Standard 1 acknowledges the difficulty that schools face in this legal area, Lines 159-161 seem to indicate that the process must be pursued for documentation. I would suggest that <u>research</u> into the state regulations be required and if they are unfavorable to homeopathy schools, that a write-up of the regulations and their limitations be sufficient for ACHENA”. Another commenter wrote: “As this (lack of clear lines for authorization of homeopathic educational programs) is the case in most states, why insist on forcing schools to prove they have taken steps to obtain an authorization that is non-existent? Inclusion of a requirement like this demonstrates, in my opinion, a clear bias towards the very few programs that already exist in such institutions. Enactment of this standard alone would make most homeopathic programs in this country ineligible for accreditation and grossly limit the public's access to the study of homeopathy”.</p> | <p>find eligible for accreditation schools which <i>are legally authorized to provide post-secondary education in the state in which they are physically located.</i> In order for ACHENA to be federally recognized as an accrediting body, we must work within the general confines of this requirement. In addition, since part of the purpose of accreditation is to provide prospective students with assurance regarding the operations of an accredited institution, ACHENA commissioners do not feel it would be responsible to simply dismiss this standard and accredit schools which clearly have no legal authorization to offer educational programs. As is stated in the “Note to Standard 1”, the specific agency which grants a school legal authority to provide secondary education varies from state to state as do the policies, procedures and requirements of these bodies. Because the professional homeopathic practitioner is seen as an emerging profession in the larger society, some states may be silent with regards to authorizing homeopathic educational programs. ACHENA recognizes the challenges that schools may experience in some states regarding obtaining legal authorization to offer secondary education. Other CAM professions and non-health care related specialized professions have experienced similar challenges in the process of gaining wider recognition. Both the language of this standard and the note to standard one have been revised. In certain circumstances, ACHENA will accept a school’s research into the jurisdiction’s policies. Schools with concerns about this standard are encouraged to contact ACHENA to explore options for addressing this standard. ACHENA will continue to access expertise and resources from the Academic Consortium for Complementary and Alternative Health Care (ACCAHC) and the Association of Specialized and Professional Accreditors (ASPA) to help define strategies for addressing issues faced by schools in meeting Standard 1.</p> |
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| 3 | <p>One commenter who is a school owner expressed concern about having owners, administrators or faculty from other schools involved in review of curriculum of his/her school due to concerns about confidentiality of the material.</p> | <p>ACHENA has policies and procedures in place to ensure that potential conflicts of interest are identified and to ensure that all commissioners and peer review site visitors respect the confidentiality of the peer review site visit and accreditation process. Schools under review also have the right to reject any proposed peer reviewer if the school feels for some reason that there is a conflict of interest or has any other concern.</p> |
| 4 | <p>Several comments were submitted in response to Standard 4 which reads: <i>“Faculty is sufficient in number, background and experience and that a system be in place for faculty evaluation”</i>. One commenter asked whether it was the school or ACHENA that would evaluate the faculty; another commenter posed the question of whether this language implied that all instructors should hold the CCH designation; another commenter expressed that all faculty should have the credential of CCH or CCH (Cand); one commenter stated that “teachers don’t always develop their own curriculum or assessment tools” as is implied in the standard.</p> | <p>ACHENA clarified this standard to state that each faculty member should be well qualified for the specific courses which they are involved in teaching. The standard was also revised to state that all faculty providing clinical supervision should hold the CCH designation or equivalent. ACHENA recognizes the importance of a diverse faculty and that some courses or course material, such as botany, anatomy, physiology, ethics, etc. may be taught by instructors who may not possess the CCH designation. ACHENA is not involved in conducting individual faculty “evaluations” but rather seeks only to ensure that schools have reasonable internal policies and practices in place for faculty evaluation. The standard was revised to clarify the extent of the role of faculty in curriculum development.</p> |
| 5 | <p>Two commenters indicated that it is not reasonable for homeopathy schools to be expected to provide student services commensurate with what might be found at a typical university or college. It was pointed out that those services can be costly and that, for the most part, students in professional practitioner programs are adults who should be self-aware of their needs and prepared to bear the costs of whatever supports they must have.</p> | <p>When reading this standard it is important to note the text in italics below: <i>“The institution provides student services which are consistent with student characteristics and it’s (i.e. the school’s) mission, goals, objectives and outcomes.”</i> This language points out that student services should be tailored to the unique school community and does not imply that the range of student services should resemble those offered at larger colleges or universities. Based on ACHENA’s understanding of the size, resources and typical student body of schools training professional homeopathic</p> |

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| | | <p>practitioners, examples of the sorts of activities that ACHENA would deem as reasonable and appropriate might be: designation of a faculty person or administrator for students to reach out to if they are needing additional support; periodic surveys of students regarding their need for support; consideration of cost-neutral approaches to meeting those needs including a range of peer-based support such as pairing students who need support with more advanced students, etc.</p> |
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| <p>6</p> | <p>With regards to Standard 10 which reads: <i>“The institution maintains physical facilities and learning resources (including instructional resources, library and clinical office) for administration, faculty and students that are appropriate for the institution’s mission and its homeopathic educational programs.”</i> one commenter summarized concerns that were heard from three commenters by writing: “This requirement for physical facilities is one that should be reconsidered. Most homeopathy schools do not own their physical space and must rent it, thus the choices are limited by costs, availability, and the rental market. This requirement, in its detail, puts undue financial pressure on the school, especially those that operate part-time. Requiring an office for administration, is a dream for many schools, who are struggling just to find adequate classroom space. In addition, in this age of digital information, the requirement of physical library facilities is almost outmoded, as well as untenable for schools that meet on a part-time, monthly basis. This requirement can put the goal of accreditation out of reach for many schools and doesn’t recognize the difficulty and compromises involved in finding appropriate teaching space”.</p> | <p>As noted in comment 5, above, the focus on physical facilities is that they should be <i>“appropriate for the institution’s mission and its homeopathic educational programs.”</i> This standard should not be read to imply that schools must own or occupy full campus facilities. It is understood that most schools offer part-time programs and a significant number of schools offer large portions of their program via distance education. The language of the standard has been revised to read: <i>“The institution maintains ownership or has access to rental or free physical facilities...”</i> Standard 10 may be met by provision of rental agreements, space use agreements or other documentation. Based on comments related to use of the term “library”, the standard has been revised to read <i>“physical or virtual library...”</i>.</p> |

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| 7 | <p>In response to Standard 5, one commenter wrote: “I don't think you can require anyone to provide you with the details of their financial resources and funding. How do you propose to keep this information secure? Who will have access to it? I doubt any school director/owner will be willing to pay for an audit by a CPA or hand over this information to a 3rd party”.</p> | <p>An important role of accreditation is to assure students who are making a financial investment in their education that the school or program is financially solvent and is not at risk of closure. It is standard that accrediting bodies review annual budgets, profit and loss statements and require an external audit. ACHENA has confidentiality attestations that are signed by all commissioners and peer reviewers to ensure that all information reviewed during the accreditation process is kept confidential.</p> |
| 8 | <p>One commenter wrote: “The availability of homeopathic education in the United States has moved from sparse to proliferative in the past 20 years. The development of blended and e-learning in educational institutions globally has trended in homeopathy as well. In fact, recent research in medicine and nursing indicates there is little statistical difference between groups in traditional learning as compared to e-learning related to student knowledge, skills, attitudes, and satisfaction. The conclusion suggests that online e-learning is equivalent, if not superior to traditional learning. http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4073252/. It is my suggestion that as ACHENA hones its accreditation process, the Board and Commissioners consider further inclusion of e-learning as the homeopathic profession moves toward greater acceptance by the larger healthcare environment”.</p> | <p>At this time, ACHENA’s standards support accreditation of schools offering blended distance learning programs with the expectation that schools have adequate in-person contact with students in order to: 1) provide sufficient clinical mentoring, and 2) assess student clinical competencies. ACHENA does not set a minimum number of in-person hours but rather leaves that determination to the school. Hence, ACHENA standards currently support blended learning programs. ACHENA would be interested in engaging in a community forum or series of discussions about whether the general field would support fully distance learning programs as appropriate for preparing professional homeopathic practitioners.</p> |
| 9 | <p>One comment was received from a school of homeopathy that operates overseas. The commenter requested clarification regarding Standard 1, whether ACHENA would accept organizations that are legitimate and legally recognized educational institutions in their own countries. In addition, the commenter inquired about how ACHENA would conduct peer review site visits (which are still included in the candidacy phase) with a school located overseas.</p> | <p>Accrediting bodies located in the US have the latitude to accredit institutions and programs that are located outside of the US. ACHENA currently accredits schools throughout North America. In addition, ACHENA recognizes that some US and Canadian residents seek training in other parts of the world and residents from other parts of the world may seek to use their education as the basis for practicing in the North America. ACHENA is in the process of considering fair and reasonable methods for completing peer review site visits for schools located overseas.</p> |

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| | | Additional information regarding this issue will be forthcoming. |
| 10 | One commenter expressed the general view: “I believe that individual educators should be responsible for creating their own environment and culture of learning, according to the unique needs and talents of their faculty and student body. ACHENA should find a way to embrace the wonderful diversity of the homeopathic community, not limit it or exclude elements of it by the imposition of a set of standards designed to favor a particular educational model”. | Standard two emphasizes that schools shall have their own mission statement, values, goals and objectives. Accreditation proceeds from the standpoint of supporting a school in fulfilling its mission and being true to its values. The comment is based on a misconception that accreditation seeks to make all schools look and teach alike. Nothing could be further from the truth. A brief survey of accredited US colleges and universities will uncover vast differences in school values, approaches to teaching, experiential learning, etc. |
| 11 | One commenter wrote: “While I agree with the removal of self-study and peer site review in the eligibility phase as a means to streamline the process and bring in schools, I sincerely hope that these two vital elements will one day be added back in (to the eligibility phase). The self-study is the core of accreditation, and while arduous, vital to the success of meaningful accreditation. The danger is that the school do not understand the nature of self-study, and thus the intent of accreditation, and that accreditation remains an external passive process, with recognition conferred from outside. It has the potential to fail to become an internalized and reflective mechanism”. | ACHENA is working hard to convey to homeopathy schools that the heart of accreditation is self-study and reflection on the school’s operations. ACHENA seeks to educate schools that in the same way that homeopaths can learn through the reflective process of sharing cases with other homeopaths, it can be a terrific experience for homeopathic educators who engage in self-study to reflect on this process with other homeopathic educators. ACHENA remains committed to offering accreditation workshops to prepare schools to conduct self-study. Self-study remains the core component of the candidacy phase before a school can receive full accreditation. ACHENA would remind this commenter that Eligibility Standard 15 reads: <i>The institution or program is prepared to undertake a comprehensive self-study in relationship to ACHENA’s accreditation standards as outlined in the 2012 Accreditation Manual</i> ”. The purpose of this standard is to ensure that schools that move from the eligibility phase of accreditation to the candidacy phase are truly prepared for meaningful self-study. |
| 12 | The sentiment of four commenters are summarized by the following comment: “In my opinion, ACHENA's mission is crucial for the | ACHENA seeks to administer a sound, fair and reasonable accreditation process that is consistent with general standards of |

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| <p>growth and progression of the homeopathic profession. I support school accreditation requirements fully. In order for homeopathy to be included in the wider healthcare milieu, our schools and practitioners must be appropriately credentialed. I believe these requirements to be appropriate, reasonable, and not onerous to implement”.</p> | <p>accrediting bodies. Our goal is to promote excellence in education of professional homeopathic practitioners and we support qualified practitioners being able to practice in the full range of practice settings. This would include practice settings where: homeopathic practitioners are working alongside conventional medical practitioners; homeopathic practitioners work with other complementary and alternative health care practitioners in holistically oriented practice settings; and, homeopathy only clinics and private practices.</p> |
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