



**ACHENA ACCREDITATION MANUAL 2012:
Structure, Scope, Eligibility and Standards**

**SUMMARY OF COMMENTS AND ACHENA DELIBERATIONS/ REVISIONS
September 18, 2012**

Comment/ Concern	ACHENA Action
<p>Implementation of the new standards by September 2013 does not give schools adequate time to implement the new standards.</p>	<p>ACHENA has revised the implementation timeline to no later than August/September 2014. That is, the new standards take effect with year one students beginning typically in August/September 2014. However, accredited institutions and programs, as well as those seeking accreditation, should begin making good faith efforts to work toward meeting the new standards</p>
<p>The standards state that institutions with institutional accreditation should submit a substantive change notice and secure ACHENA review and approval prior to commencing any new program. Several concerns were raised about this requirement and questions were posed about how this process would work.</p>	<p>ACHENA has developed a Substantive Change form that will allow institutions and programs to submit information about new programs under development. ACHENA will work to ensure this process is not cumbersome and will process approval for new programs within a reasonable period of time. ACHENA does not seek to stifle the growth of new and diverse programs in homeopathy. The main focus of ACHENA's review of the addition of new programs is to ensure that new programs do not negatively impact the implementation of the Master's Degree in Homeopathy or Homeopathic Practitioner Diploma or Certificate Program.</p>
<p>General Eligibility Standard 4.0.6 states that "the institution regularly undergoes and makes available to the Commission an external audit by a CPA". One comment indicated that such reports are a significant expense and should only be required periodically, for example the year of reaccreditation.</p>	<p>ACHENA will revise the language under Eligibility Standard 4.0.6 to replace the word "regularly" with "periodically". To clarify this, please review Standard 12.6 which has been revised to read: "For the most recent year prior to submitting an Eligibility Report or seeking reaccreditation, a full audit with a management letter, certified by a licensed CPA, must be available to provide a detailed and accurate picture of the financial status of the program since the preceding year's reviewed financial statement. It must include a balance sheet statement, certified for one year, the statement of revenue and expenditures, and change in fund balance and/or financial position, all certified by an independent auditor with no relation to the institution. This audit must be reviewed by the appropriate individuals or responsible groups within the program."</p>

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General eligibility requirement 4.0 # 8 is too restrictive in outlining the nature and composition of the governance structure.	ACHENA has revised this requirement to read: "The institution or program has a clearly defined functioning governance structure responsible for the quality and integrity of the institution and its homeopathic programs, as well as to ensure that the institution/program's mission, goals and objectives are being carried out".
Several ACHENA standards and criterion related to governance appear to be based on the assumption that schools are non-profit educational organization governed by an independent board of directors. Please clarify the organizational types that are eligible for accreditation by ACHENA.	ACHENA added language to Standard 2 to clarify the organizational types eligible for accreditation, Criterion 2.2: Organizational types eligible for accreditation. To be eligible for accreditation, the institution must be one of the following: a public or private nonprofit educational institution, a proprietary institution of higher education, or a public or private non-profit post-secondary vocational institution.
Requiring a single Chief administrator is too restrictive and should be expanded to allow programs to use administrative teams or collective leadership teams.	ACHENA revised the language throughout the document to state "chief administrator or administrative team responsible for operation".
Requiring for admission completion of 60 credits at the undergraduate level will exclude some students. It was noted that mature students with life experience but no college education can make excellent professional homeopaths.	ACHENA added the following guideline under criterion 6.1. "On a limited basis, institutions or programs offering the Professional Homeopathic Practitioner Level Diploma or Certificate Program (i.e. not the Master of Homeopathy) may exempt exceptional students from the requirement of prior academic experience but the rationale for the exemption and unique experience of the student must be clearly documented in admissions records of the student."
Requiring 125 hours of on-campus clinical observation exceeds the commitment most distance learning students are able to make. The availability of synchronous distance learning methods enables students to observe clinical practice in a manner that is similar or identical to students who are present in the classroom.	Criterion 8.9 was revised to read as follows: "Programs and institutions should provide ample, meaningful clinical observation opportunities for all students. Institutions and programs should ensure that distance learning students have sufficient opportunities for live, in-person or synchronous clinical observation of experienced clinicians or senior students taking, analyzing and managing cases in a teaching clinic". Criterion 8.10 was revised to include the following guideline: "Institutions and programs that offer distance education must establish an on-campus clinical training component for distance learning students. The on-campus clinical training component must be of sufficient length and quality to ensure that such student is prepared for clinical practice upon graduation. It must be of sufficient length to afford an opportunity for the skills development by the student as well as direct observation and assessment by faculty of each distance learning student's case taking and clinical skills".

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Criterion 8.6 requires reporting of a significant increase in student enrollment in distance learning programs. This requirement appears unnecessary and more of a regulatory issue than an accreditation issue.	This requirement comes from the US Department of Education. It grew out of the observation that some distance learning programs grew so fast that they could not manage the needs of students. ACHENA will retain this standard as is.
Criterion 6.10 Retention and Graduation rates sets standards that are too aggressive requiring ACHENA review when retention rate falls below 65% or graduation rate falls below 50%.	Student retention and graduation rates are critical indicators in education. ACHENA will retain this standard as is.
One commenter suggested changing re-accreditation process to allow for five or even seven years accreditation.	ACHENA will extend the length of accreditation to 5 years.
The requirement of keeping records on site is problematic. Accommodation should be made for programs/ institution without full time space or limited space.	The requirement to keep records on site was eliminated. The standard was revised to read as follows: "Institution/ program should ensure convenient access by students to all student records, including academic, attendance, and financial records. If records are not stored on-site, the institution/ program must ensure secure on-line access to student records."
Please clarify the responsibility of an accredited institution or program to provide coursework in anatomy and physiology and pathology and disease and explain how this coursework relates to the overall 1000 hour program of study.	The following language has been added to Standard 8: Program of Study, 14: "Accredited institutions and programs must ensure that, prior to graduation, all students have completed coursework in anatomy and physiology and pathology and disease. This coursework should be equivalent to a 3 credit college course in anatomy and physiology and a 3 credit college course in pathology and disease. The institution or program may provide the coursework directly or offer students a list of options/ resources where the coursework may be completed. Please Note: These two, 3 credit courses, or their equivalents, do not count toward the required 1,000 hours of coursework in homeopathy. However, discussion of anatomy and physiology and pathology and disease in the context of case taking, analysis and the study of material medica may be considered part of the 1,000 hours of study."
Schools of homeopathy have played an important role in conducting proving of new homeopathic remedies. What is ACHENA's guidance regarding student participation in a proving?	Schools of homeopathy can play an important role in expanding materia medica by conducting well run provings. Participating in a proving can be a valuable experience for students of homeopathy. However, student participation in school-sponsored provings should be voluntary. Please see Standard 8.12 and the associated guideline for further clarification.