#### Updated and Adopted ACHENA Accreditation Standards: Summary of Public Comments and ACHENA Deliberations March, 2022

#### Background

ACHENA Accreditation Standards are community-accepted benchmarks that accredited schools follow to promote high quality education of professional practitioners of classical homeopathy. These standards support the presence of well-qualified faculty, up-to-date curriculum, adequate direction and resources to support educational programs, and appropriate consumer protections, including fair and unbiased assessment of student performance. ACHENA is responsible for conducting periodic review of these standards and updating them in accordance with a well-defined public comment process. A Public Comment Period to solicit comments on the proposed revised Accreditation Standards began on December 13<sup>th</sup> and concluded on January 14<sup>th,</sup> 2022. Information about the opportunity for public comment was made widely available on multiple occasions through the ACHENA listserve, NCH communications, announcements at meetings, and other methods. A community forum was held on January 10<sup>th</sup> with accredited schools to review and discuss the proposed revisions.

Comments were received from six different sources: two sets of comments were received from general community members; two sets of comments were received from individuals involved in homeopathy education, but did not represent official correspondence from a school; and two sets of comments were presented as official correspondence from schools of homeopathy.

The ACHENA Standards Committee reviewed these comments carefully, made numerous revisions to the proposed standards based on the comments, and the full commission voted on February 18, 2022 to adopt the resulting set of updated standards.

#### **Overarching Comments**

The following were provided as overarching comments:

- Very well done. Should result in higher quality outcomes for students.
- Very nice work on this (a lot of work as it appears).
- Overall, the changes are excellent and make good sense.
- Overall, the guidance has come a very long way.
- They address needed areas of development in order for ACHENA to comply with Department of Education standards and to grow Homeopathy.
- I have no substantive objection to any of the criteria, especially knowing that these are also part of national educational requirements. My biggest comment is that many revisions have more "academic and admin speak" wording than the originals.

Below is a three-column table that outlines the proposed revised standards, the final updated and adopted standards, and a description of comments received and ACHENA's response. A document outlining the past standards and updated and adopted standards is also available.

# Standard 1: Purpose

Proposed Revised Standard	Updated and Adopted Standard	Comments & Response
Standard 1—Mission Statement The institution or program shall have a concise mission statement that provides clear direction for the institution and its programs. This is combined with the formal adoption of an additional statement regarding the training of professional practitioners of classical homeopathy. The ultimate aim is to establish an integrated and tiered series of achievable educational goals and objectives at the institutional, programmatic and course level. These serve as a benchmark against which all organizational outcomes can be measured to ensure fulfillment of the mission.	Standard 1—Mission Statement The institution or program shall have a concise mission statement that provides clear direction for the institution and its programs in the training of professional practitioners of classical homeopathy. Institutional, programmatic and course level goals and objectives flow from the mission statement and serve as a benchmark against which all organizational outcomes can be measured to ensure fulfillment of the mission.	Revisions made. Multiple commenters suggested simplifying/clarifying the language here, and specific suggestions were noted from the meeting with various ACHENA-accredited school leaders.
Criterion 1.1 – Description	Criterion 1.1 – Description	Revisions made. Multiple commenters suggested
The mission statement should be precise and describe the institution's fundamental purpose. Clearly specified programmatic and/or educational goals and objectives reflect how the mission statement is to be achieved and may address philosophical,	The mission statement should be precise and describe the fundamental purpose the program fulfills, the philosophies it represents, the community it serves and the social, cultural and economic needs of the institution and its community. Clearly	incorporating language from the original Standard.

Proposed Revised Standard	Updated and Adopted Standard	Comments & Response
social, cultural and or economic needs of the institution and its community.	specified programmatic and/or educational goals and objectives reflect how the mission statement is to be achieved.	
Guideline: The mission statement and objectives form a part of the strategic planning process that includes consultations and support from the community and is disseminated widely within. Guideline: The primary mode of delivery of the program is specified and a description as to how this supports the mission and how	<ul> <li>Guideline: The mission statement and objectives form a part of the strategic planning process that includes input from stakeholders.</li> <li>Guideline: The primary mode of delivery of the program is specified and a description as to how this supports the mission and how</li> </ul>	
sufficient quality is maintained must be provided.	sufficient quality is maintained must be provided.	
Criterion 1.2 – Educational Goals and Objectives	Criterion 1.2 – Educational Goals and Objectives	The first Guideline was revised for clarity based on commenter's suggestions.
The program must maintain clearly specified and measurable educational goals and objectives which reflect the desired program outcomes and is consistent with the degree, certificate or diploma it awards.	The program must maintain clearly specified and measurable educational goals and objectives which reflect the desired program outcomes and is consistent with the degree, certificate or diploma it awards.	
<b>Guideline:</b> Educational goals and objectives should provide the parameters within which the institution's instructional activities can be verified and consists of an inclusive	<b>Guideline:</b> Educational goals and objectives provide a framework of outcomes from the institution's educational activities that are reviewed through a process involving qualified stakeholders.	

Proposed Revised Standard	Updated and Adopted Standard	Comments & Response
process that provides meaningful evidence		
of outcomes for that verification.	Guideline: Goals and objectives may include	
	but are not limited to:	
Guideline: Goals and objectives may include		
but are not limited to:	1 - Local, regional and national needs for	
	homeopathic services.	
1 - Local, regional and national needs for	2 - National standards of professional	
homeopathic services.	competency and practice.	
2 - National standards of professional	3 – Contributions to the evolving body of	
competency and practice.	scientific and professional knowledge;	
3 – Contributing to the evolving body of	4 - Job placements and possible career	
scientific and professional knowledge;	paths.	
4 - Job placements and possible career paths.		
Criterion 1.3 – Strategic Planning and	Criterion 1.3 – Strategic Planning and	Revisions were made based on
Review Process	Review Process	commenters suggestions for
		additional clarity in the language.
The regular reassessment of the program's	The regular reassessment of the program's	
goals and objectives demonstrates whether	goals and objectives demonstrates whether	
the mission continues to be relevant and	the mission continues to be relevant and	
consistently fulfilled. Measurable indicators	consistently fulfilled. Measurable indicators	
of student success derived from data and	of student success derived from data and	
institutional progress provide the requisite	institutional progress (such as grades, clinical	
key performance indicators to fulfill this	progress and supervision reports) provide	
requirement.	the requisite key performance indicators to	
	fulfill this requirement.	
Guideline: Reliable feedback loops gather		
data and other information about all areas of	Guideline: Reliable feedback loops gather	
operations (e.g. Admissions, Technology,	data and other information about all areas of	
Academics, Finance, Alumni, Faculty, Human	operations (e.g. Admissions, Technology,	

Proposed Revised Standard	Updated and Adopted Standard	Comments & Response
Resources) to inform the planning and	Academics, Finance, Alumni, Faculty, Human	
continuous improvement review process.	Resources) to inform the planning and	
	continuous improvement review process.	
Guideline: This process results in the		
development of action plans based on	Guideline: This process results in the	
measured outcomes to help implement	development of action plans based on	
appropriate strategic priorities.	measured outcomes to help implement	
	appropriate strategic priorities.	
Guideline: The review process should		
include representatives of the student body,	Guideline: The review process should	
faculty, administration, alumni, and the	include representatives of the student body,	
governing board.	faculty, administration, alumni, and the	
	governing board, where appropriate.	

Standard 2: Legal Organization

No proposed revisions to Standard 2 at this time.

### **Standard 3: Governance**

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Standard 3 - Governance The institution shall have a clearly defined governance structure that includes a governing body. The governing body consists of qualified individuals that are guided by a set of bylaws and an appropriate Conflict of Interest policy. The governing board exercises ultimate and general control over the institution's affairs.	Standard 3 - Governance The institution shall have a clearly defined governance structure that includes a governing body. The governing board exercises ultimate and general control over the institution's affairs. The governing board consists of qualified individuals that are guided by a set of bylaws and an appropriate Conflict of Interest policy. The program conducts its operations with honesty and integrity.	The language was re-ordered for clarity and 'operating with honesty and integrity' was added here based on a commenters strong suggestion that it not be cut (originally found in 4.4).
<ul> <li>Criterion 3.1 – Membership</li> <li>The membership of the governing body is clearly identified of the institution.</li> <li>Guideline: Governing board members follow a prescribed and consistent selection pathway that includes the application of a stringent Conflict of Interest policy.</li> </ul>	<ul> <li>Criterion 3.1 – Membership</li> <li>The membership of the governing body is clearly identified by the institution.</li> <li>Guideline: Governing board members follow a prescribed and consistent selection pathway that includes the application of a stringent Conflict of Interest policy.</li> </ul>	Additional terms for leadership role have been added based on suggestions from multiple commenters. Second guideline was revised for grammatic clarity.
<b>Guideline:</b> The Governing Board is responsible for selecting a highly qualified Chief Executive Officer to oversee the day-to- day operations of the institution.	<b>Guideline:</b> The Governing Board is responsible for selecting a highly qualified Chief Executive Officer, Executive Director, Chief Administrator or President to oversee the day-to-day operations of the institution.	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
<b>Guideline:</b> There shall be a clearly defined process which ensures a reasonable degree of faculty and student participation in governance of the institution.	<b>Guideline:</b> There shall be a clearly defined process which ensures a reasonable degree of faculty and student participation in governance of the institution.	
<b>Guideline:</b> Governing board members and their qualifications are depicted on the institution's website.	<b>Guideline:</b> Governing board members and their qualifications are listed on the institution's website.	
<b>Guideline</b> : Governance input may emanate from advisory boards of faculty, students or the general public.	<b>Guideline</b> : Governance input may emanate from advisory boards of faculty, students or the general public.	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
Criterion 3.2 Role	Criterion 3.2 Role	Revisions were made based on two commenter's suggestions
The governance structure is responsible for administrative oversight and demonstrates capability and stability in the institution's efficient and effective deployment of resources. This includes ensuring that a highly qualified Chief Executive Officer provides for sufficient administrative capacity, succession and business continuity planning and that the institution demonstrates sufficient competence to fulfill its mission and is able to meet its responsibilities to students.	The governance structure allows for general oversight and stability in the institution's efficient and effective deployment of resources. This includes ensuring that a qualified Chief Executive Officer, Executive Director, Chief Administrator or President provides for sufficient administrative capacity, succession and business continuity planning and that the institution demonstrates sufficient competence to fulfill its mission and is able to meet its responsibilities to students.	two commenter's suggestions for clarity in language and avoidance of subjective language.
<b>Guideline:</b> The institution's owners and/or board members possess the qualifications to effectively oversee its successful operation.	<b>Guideline:</b> The institution's leaders and/or board members possess the qualifications to effectively oversee its successful operation.	
<b>Guideline:</b> Board officials exhibit the skills and experience necessary for establishing broad policy, long-range planning, appointing and evaluating leadership, ensuring financial stability and reviewing and approving the annual budget, approving major program changes and playing a major role in the development of external relations.	<b>Guideline:</b> Board officials exhibit the skills and experience necessary for establishing broad policy, long-range planning, appointing and evaluating leadership, ensuring financial stability and reviewing and approving the annual budget, approving major program changes and playing a major role in the development of external relations.	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Criterion 3.3 – Bylaws, Policies and Procedures The governing-board has a set of bylaws and clearly define and/or oversee the formulation of a set of board and operational level policies	Criterion 3.3 – Bylaws, Policies and Procedures The governing/advisory board presides over a set of bylaws and a clearly defined set of board and operational policies that explain	This was revised for clarity at the request of multiple commenters. Additionally, subjective language was removed.
and procedures that address and ensure all facets of the successful and consistent operation of the institution including the minimization of legal, operational and financial risk.	the power, duties, meeting schedule, membership requirements, terms of office, and responsibilities of the governing bodies. These address all facets of the operation of the institution including the minimization of legal, operational and financial risk.	
<b>Guideline:</b> Board policies and procedures addres the composition, responsibilities, duties and terr of office		
Guideline: Operational policies and procedures address academic and clinical teaching, faculty, legal and financial, student services, student and institutional assessments, records, admissions and recruitment, online learning, facilities and library aspects.	<b>Guideline</b> : Operational policies and procedures address academic and clinical teaching, faculty, legal and financial, student services, student and institutional assessments, records, admissions and recruitment, online learning, facilities and library aspects.	

## **Standard 4: Administration**

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
Standard 4 - Administration The program has an appropriately qualified chief administrator who is fully dedicated to the institution and an appropriately qualified chief academic administrator who is able to effectively manage and revise the program as needed as well as an administrative team with sufficient capacity and definition of roles and responsibilities and of a size and structure that is appropriate to the size and purpose of the program.	Standard 4 - Administration The program has an appropriately qualified and dedicated Chief Executive Officer, Executive Director, Chief Administrator or President and an appropriately qualified chief academic administrator who is able to effectively manage and revise the program as needed as well as an administrative team with sufficient capacity and definition of roles and responsibilities and of a size and structure that is appropriate to the size and purpose of the program.	Additional roles were added here for consistency and the phrase 'fully dedicated' was revised for clarity based on feedback from a commenter.
Criterion 4.1 Chief Administrator and the Leadership Team The chief administrative officer is responsible for the entire operation of the institution or program, and is directly responsible for the formulation and administration of the policies and procedures as approved by the governing body.	Criterion 4.1 Chief Administrator and the Leadership Team The Chief Executive Officer, Executive Director, Chief Administrator or President is responsible for the entire operation of the institution or program, and is directly responsible for the formulation and administration of the policies and procedures as approved by the governing body.	Additional roles were added here for consistency. The last Guideline was revised for clarity, based on suggestions from a commenter.

Guideline: The chief administrator and	Guideline: The chief administrator and	
members of the senior leadership team	members of the senior leadership team	
have clearly defined written job	have clearly defined written job	
descriptions that describe the roles and	descriptions that describe the roles and	
responsibilities for each position. The job	responsibilities for each position. The job	
description requires periodic review and	description requires periodic review and	
must be updated as the institution or	must be updated as the institution or	
program undergoes a significant change in	program undergoes a significant change in	
operations, mission, scope or size.	operations, mission, scope or size.	
Guideline: The chief administrator serves	Guideline: The chief administrator serves	
as a liaison between the governing body	as a liaison between the governing body	
and program staff. Responsibilities are	and program staff. Responsibilities are	
delegated to the administrative staff. The	delegated to the administrative staff. The	
chief administrator and all administrative	chief administrator and all administrative	
staff participate in a regular evaluation	staff participate in a regular evaluation	
process.	process.	
Guideline: The chief administrator and the	Guideline: The chief administrator and the	
senior leadership team provide appropriate	senior leadership team provide appropriate	
direction and control for the development	direction and control for the development	
and operation of all institutional and	and operation of all institutional and	
program functions, ensure the	program functions, ensure the	
development and implementation of	development and implementation of	
appropriate policies and procedures, of the	appropriate policies and procedures, of the	
strategic plan, execute a prudent fiscal	strategic plan, execute a fiscal	
management plan and maintain a sound	management plan and maintain an	
administrative structure to ensure for	administrative structure to ensure for	
accountability and sound communications	accountability and sound communications	
between the institution and its community.	between the institution and its community.	

<b>Guideline:</b> It is advisable for the chief program administrator to possess a degree in higher education.	<b>Guideline:</b> It is advisable that the chief program administrator or someone on the Leadership Team, have a Masters or other advanced degree in Higher Education.	
Criterion 4.2 Organization of staff The administrative staff demonstrate stability, adequate qualifications and have clearly defined roles and responsibilities.	<b>Criterion 4.2 Organization of staff</b> The administrative staff have adequate qualifications and clearly defined roles and responsibilities.	Language was revised here for clarity based on feedback from a commenter.
<b>Guideline:</b> An organizational chart depicting roles, responsibilities and reporting lines exists.	<b>Guideline:</b> An organizational chart depicting roles, responsibilities, and reporting lines exists.	
<b>Guideline:</b> All administrative staff have clearly defined, written job descriptions which undergo periodic review as necessary.	<b>Guideline:</b> All administrative staff have clearly defined, written job descriptions which undergo periodic review as necessary.	
Criterion 4.3 Academic Leadership	Criterion 4.3 Academic Leadership	
Program leadership has a clearly defined and effective structure that ensures effective teaching, programmatic review and student involvement. Academic leadership facilitates curriculum development and ongoing assessment of the program. Academic leadership are able	Program leadership has a clearly defined and effective structure that ensures effective teaching, programmatic review and student involvement. Academic leadership facilitates curriculum development and ongoing assessment of the program. Academic leaders	

to demonstrate appropriate academic qualifications.	demonstrate appropriate academic qualifications.	
This criterion has been deleted as it has	This criterion has been deleted as it has	
been addressed elsewhere.	been addressed elsewhere.	

## **Standard Five: Records**

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Standard 5 – Maintaining Record	Standard 5 – Maintaining Record	
Keeping Systems	Keeping Systems	
The program shall maintain complete record keeping systems.	The program shall maintain complete record keeping systems.	
Criterion 5.1 Permanent Student Records	Criterion 5.1 Permanent Student Records	The last Guideline was revised for clarity based on feedback from a
Observing the requirements of right-to- privacy legislation, the program maintains and safeguards accurate permanent academic records that document student participation and success.	Observing the requirements of right-to- privacy legislation, the program maintains and safeguards accurate permanent academic records that document student participation and success.	commenter.
<b>Guideline:</b> The institution/program has a set of document retention policies and procedures for the maintenance and secure storage of all student records.	<b>Guideline:</b> The institution/program has a set of document retention policies and procedures for the maintenance and secure storage of all student records.	
<b>Guideline:</b> In the event that an institution is required to close, a plan to preserve and make available all student records has been formulated.	<b>Guideline:</b> In the event that an institution is required to close, a plan to preserve and make available all student records has been formulated.	
<b>Guideline:</b> The institution/program ensures through the implementation of a records policy, the convenient access to academic,	<b>Guideline:</b> The institution/program ensures through the implementation of a records policy, the convenient access to academic,	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
attendance, and financial records by students. If records are not stored on-site, the institution/program must ensure secure	attendance, and financial records by students. If records are not stored on-site, the institution/program must ensure secure	
and ready on-line access <del>.</del> Guideline: Institutions have a backup disaster recovery plan.	and ready on-line access <del>.</del> Guideline: Institutions have a backup electronic disaster recovery plan.	
Criterion 5.2 – Clinical Care and Student Records	Criterion 5.2 – Clinical Care and Student Records	
The program maintains clinical records of all clients attended to by students. The institution is responsible for maintaining complete, accurate, secure, and confidential records which abide by generally accepted standards of health care practice and federal HIPAA laws.	The program maintains clinical records of all clients attended to by students. The institution is responsible for maintaining complete, accurate, secure, and confidential records which abide by generally accepted standards of health care practice and federal HIPAA laws.	
<b>Guideline:</b> The program makes best efforts to translate foreign language records into English to maintain the highest level of homeopathic care possible by current and future caregivers. All records shall be maintained for a minimum of seven years.	<b>Guideline:</b> The program makes best efforts to translate foreign language records into English to maintain the highest level of homeopathic care possible by current and future caregivers. All records shall be maintained for a minimum of seven years.	
<b>Guideline:</b> Institutions develop, implement and closely monitor policies and practices to ensure that clinical records prepared by	<b>Guideline:</b> Institutions develop, implement and closely monitor policies and practices to ensure that clinical records prepared by	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
students and shared between students and clinical supervisors are transmitted and maintained in a secure and confidential manner.	students and shared between students and clinical supervisors are transmitted and maintained in a secure and confidential manner.	
<b>Guideline:</b> Clinical records resulting from student work require review and evaluation by the supervisor as well as signature by both student and supervisor.	<b>Guideline:</b> Clinical records resulting from student work require review and evaluation by the supervisor as well as signature by both student and supervisor.	
Criterion 5.3 – Data	Criterion 5.3 – Data	Language was revised for grammar and syntax based on suggestions
The program must maintain the following data:	The program must maintain the following data:	from two commenters.
<ol> <li>1 - Number of students applied and accepted, enrolled, graduated and readmitted.</li> <li>2 - Age, sex, educational background, and racial origins (optional) of the student body.</li> </ol>	<ol> <li>1 - Number of students who applied and were accepted, enrolled, graduated and readmitted.</li> <li>2 - Age, gender, educational background, and racial origins (optional) of the student body.</li> </ol>	

### **Standard 6: Admissions**

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Standard 6 - Admissions	Standard 6 - Admissions	Revisions were made for clarity based on feedback from three
The program has implemented an	The program has implemented an	commenters.
admissions policy that clearly states the	admissions policy that clearly states the	
educational requirements necessary to	educational requirements necessary to	
achieve academic and professional success.	achieve academic and professional success.	
This requires the satisfactory completion of	This requires the satisfactory completion of	
at least two academic years (60 semester	at least two academic years (60 semester	
credits/90 quarter credits) or its equivalent, of education at the baccalaureate level that	credits/90 quarter credits) or its equivalent, of education at the baccalaureate level.	
is appropriate preparation for graduate level work. Admissions criteria align with	Admissions criteria align with the institution's mission and target student	
the institution's mission and student	population.	
population served.	The program formulates, documents and	
The program formulates, documents and	implements a robust, systematic and	
implements a robust, systematic and	consistent assessment process by a qualified	
consistent assessment process by a qualified	individual/s that determines an applicant's	
individual/s that determines an applicant's	level of academic readiness as well as	
level of academic readiness as well as	acceptable prior learning or transfer credit/s	
acceptable prior learning or transfer credit/s	to be applied towards completion of the	
to be applied towards completion of the	professional program.	
professional program.		
The institution admits students regardless		
of race, national origin, ability, sex, gender,		

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
sexual orientation or age.	The institution admits students regardless	
	of race, national origin, ability, sex, gender,	
The institution is responsible for	sexual orientation or age.	
establishing a reliable and documented		
applicant/student verification process and	The institution is responsible for	
admissions criteria requiring documentation	establishing a reliable and documented	
that applicants possess the ability to be	applicant/student verification process and	
successful in the program and/or successful	admissions criteria requiring documentation	
in a distance education environment if used	that applicants possess the likelihood to be	
as a mode of delivery.	successful in the program and/or successful	
	in a distance education environment if used	
	as a mode of delivery.	
Criterion 6.1 - General Admissions	Criterion 6.1 - General Admissions	Revisions were made here for
		consistency with language above,
The entry criteria is a minimum of a 2-year	The entry criteria is successful completion of	based on a suggestion from a
Associate's degree or 2 years completed of	at least two academic years (60 semester	commenter.
a Baccalaureate degree. In the absence of	credits/90 quarter credits) or 2 years	
being able to verify the completion of the	completed of a Baccalaureate degree. In	The fourth Guideline was revised
degree/credits, the program must	the absence of being able to verify the	for clarity based on suggestions
demonstrate an acceptable process for	completion of the degree/credits, the	from a commenter.
assuring equivalent competence in the	program must demonstrate an acceptable	
assignment of credit(s) and/or work	process for assuring equivalent competence	
experience for prior or experiential learning.	in the assignment of credit(s) and/or work	
Either or a combination of the following	experience for prior or experiential learning.	
assessment techniques may be used: (1)	Either or a combination of the following	
credit by examination through the use of	assessment techniques may be used: (1)	
standardized tests and/or (2) assignment of	credit by examination through the use of	
credit for military and corporate training	standardized tests and/or (2) assignment of	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
based on recommendations established by	credit for military and corporate training	
the American Council on Education.	based on recommendations established by	
	the American Council on Education.	
Guideline: Credit by examination can be		
earned through successful testing and the	Guideline: Credit by examination can be	
recommended college credit equivalencies	earned through successful testing and the	
of the College Scholarship Service's AP	recommended college credit equivalencies	
(Advanced Placement) examinations, the	of the College Scholarship Service's AP	
College Scholarship Service's CLEP (College	(Advanced Placement) examinations, the	
Level Examination Program) examinations,	College Scholarship Service's CLEP (College	
the American College Testing PEP	Level Examination Program) examinations,	
(Proficiency Examination Program)	the American College Testing PEP	
examinations, PONSI (N.Y. State	(Proficiency Examination Program)	
Department of Education Program on Non-	examinations, PONSI (N.Y. State	
collegiate Sponsored Instruction), the USAFI	Department of Education Program on Non-	
(U.S. Armed Forces Institute) program, and	collegiate Sponsored Instruction), the USAFI	
the DANTES (Defense Activity for Non-	(U.S. Armed Forces Institute) program, and	
Traditional Education Support) tests.	the DANTES (Defense Activity for Non-	
	Traditional Education Support) tests.	
Guideline: Credit for military and corporate		
training may be assigned according to the	Guideline: Credit for military and corporate	
recommendations established by the	training may be assigned according to the	
American Council on Education in the	recommendations established by the	
National Guide to Educational Credit for	American Council on Education in the	
Training Programs and the Guide to the	National Guide to Educational Credit for	
Evaluation of Educational Experience in the	Training Programs and the Guide to the	
Armed Services.	Evaluation of Educational Experience in the	
	Armed Services.	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Guideline: The program should inform	Guideline: The program should inform	
students who are awarded credit through	students who are awarded credit through	
prior learning assessment, that some state	prior learning assessment, that some state	
licensing agencies and some institutions	licensing agencies and some institutions	
may not accept prior learning assessment	may not accept prior learning assessment	
credits that have been awarded by a non-	credits that have been awarded by a non-	
regionally accredited institution.	regionally accredited institution.	
Guideline: On a limited basis, institutions or	Guideline: On a limited basis, institutions or	
programs offering the Professional	programs offering the Professional	
Homeopathic Practitioner Level Diploma or	Homeopathic Practitioner Level Diploma or	
Certificate Program (i.e. not the Master of	Certificate Program (i.e. not the Master of	
Homeopathy) may exempt exceptional	Homeopathy) may exempt exceptional	
students from the requirement of prior	students from the requirement of prior	
academic experience but the rationale for	academic experience or military and	
the exemption and unique experience of the	corporate training, but the rationale for the	
student must be clearly documented in	exemption and unique experience of the	
admissions records of the student.	student must be clearly documented in	
	admissions records of the student.	
Guideline: In situations beyond the control		
of a foreign applicant, when transcripts and	Guideline: In situations beyond the control	
documents are not available to confirm	of a foreign applicant, when transcripts and	
completion of prior postsecondary	documents are not available to confirm	
education, a special admissions procedure	completion of prior postsecondary	
may be employed, on a case-by-case basis,	education, a special admissions procedure	
to determine the level of education earned	may be employed, on a case-by-case basis,	
and/or what additional preparation will be	to determine the level of education earned	
	and/or what additional preparation will be	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
required in order to meet the admissions	required in order to meet the admissions	
standard.	standard.	
Guideline: In considering the acceptance of	Guideline: In considering the acceptance of	
education and training obtained in foreign	education and training obtained in foreign	
countries, the program should obtain	countries, the program should obtain	
advisory assistance from a reputable foreign	advisory assistance from a reputable foreign	
credentials assistance agency for the	credentials assistance agency for the	
interpretation of foreign educational	interpretation of foreign educational	
credentials to assist with approximating	credentials to assist with approximating	
comparable levels of educational	comparable levels of educational	
achievement in the U.S.	achievement in the U.S.	
Criterion 6.2 – Advanced Standing	Criterion 6.2 – Advanced Standing	
The program may accept transfer credit and	The program may accept transfer credit and	
or prior academic and/or professional	or prior academic and/or professional	
learning that is judged to be equivalent to	learning that is judged to be equivalent to	
its requirements for graduation from the	its requirements for graduation from the	
professional program; however, a minimum	professional program; however, a minimum	
of one-quarter of the total-program clock	of one-quarter of the total-program clock	
hours [or equivalent credit hours required	hours (or equivalent credit hours) required	
for completion must be taken in the	for completion must be taken in the	
program granting the certificate or degree	program granting the certificate or degree	
designating successful completion of the	designating successful completion of the	
program. This includes a minimum or ½ of	program. This includes a minimum or ½ of	
the clock hours (or equivalent credit hours)	the clock hours (or equivalent credit hours)	
of the clinical training program.	of the clinical training program.	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Guideline: The program must demonstrate	Guideline: The program must demonstrate	
an acceptable process for assuring	an acceptable process for assuring	
equivalent competence in the acceptance of	equivalent competence in the acceptance of	
transfer credits and/or prior learning credits.	transfer credits and/or prior learning credits.	
<b>Guideline:</b> Assessment of prior learning and transfer credits should be completed by persons qualified to make such assessments.	<b>Guideline:</b> Assessment of prior learning and transfer credits should be completed by persons qualified to make such assessments.	
<b>Guideline:</b> In considering the acceptance of education and training obtained in foreign countries, the program should obtain advisory assistance from a reputable foreign credentials assistance agency for the interpretation of foreign educational credentials to assist with approximating	<b>Guideline:</b> In considering the acceptance of education and training obtained in foreign countries, the program should obtain advisory assistance from a reputable foreign credentials assistance agency for the interpretation of foreign educational credentials to assist with approximating	
comparable levels of educational achievement in the U.S.	comparable levels of educational achievement in the U.S.	
Criterion 6.3 Policy publication	Criterion 6.3 Policy publication	
The program's admissions policy, including policies for evaluating transfer credit and prior learning, must be clearly stated in institutional publications including, but not limited to website, catalogue and handbooks. Published transfer policies must include a statement established by the	The program's admissions policy, including policies for evaluating transfer credit and prior learning, must be clearly stated in institutional publications including, but not limited to website, catalogue and handbooks. Published transfer policies must include a statement established by the	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
institution regarding transfer of credit	institution regarding transfer of credit	
earned at another institution of higher	earned at another institution of higher	
education.	education.	
This criterion has been deleted as it has	This criterion has been deleted as it has	
been addressed elsewhere.	been addressed elsewhere.	
This criterion has been deleted as it has	This criterion has been deleted as it has	
been addressed elsewhere.	been addressed elsewhere.	
Criterion 6.4 – Course Prerequisites	Criterion 6.4 – Course Prerequisites	The word 'necessary' was removed due to redundancy as
The program must show evidence that it has	The program must show evidence that it has	suggested by a commenter.
identified appropriate course prerequisites	identified appropriate course prerequisites	
where applicable, and that students	where applicable, and that students	
enrolled in a course have completed all	enrolled in a course have completed all	
necessary prerequisites.	prerequisites.	
Criterion 6.5 Recruitment	Criterion 6.5 Recruitment	
The program must observe honest, ethical,	The program must observe honest, ethical,	
and legal recruiting practices. Marketing	and legal recruiting practices. Marketing	
materials and representations made to	materials and representations made to	
prospective students must be clear and	prospective students must be clear and	
accurate.	accurate.	
Criterion 6.6 English language	Criterion 6.6 English language	
competency	competency	
The institution's admissions criteria disclose	The institution's admissions criteria disclose	
procedures for verifying appropriate	procedures for verifying appropriate	
language proficiencies.	language proficiencies.	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
a) English language competency is required	a) English language competency is required	
of all students seeking admission to any	of all students seeking admission to any	
program. For English language programs, a	program. For English language programs, a	
recommended minimum score of 500 on	recommended minimum score of 500 on	
the Test of English as a Foreign Language	the Test of English as a Foreign Language	
(TOEFL) (or equivalent score in IELTS) and a	(TOEFL) (or equivalent score in IELTS) and a	
minimum of the currently reported mean	minimum of the currently reported mean	
score on the Test of Spoken English (TSE);	score on the Test of Spoken English (TSE);	
	(b) For non-English programs, a	
(b) For non-English programs, a	recommended TOEFL score of at least 450	
recommended TOEFL score of at least 450	must be obtained and a minimum mean	
must be obtained and a minimum mean	score on the TSE, or the student must have	
score on the TSE, or the student must have	completed a two-year (60 semester credits	
completed a two-year (60 semester credits	or 90 quarter credits) baccalaureate level	
or 90 quarter credits) baccalaureate level	education in an institution accredited by an	
education in an institution accredited by an	agency recognized by the U.S. Secretary of	
agency recognized by the U.S. Secretary of	Education or from an equivalent English	
Education or from an equivalent English	language institution in another country.	
language institution in another country.	Applicants who do not satisfy this	
Applicants who do not satisfy this	requirement may be considered for	
requirement may be considered for	admission with English as a second	
admission with English as a second	language, but the English proficiency	
language, but the English proficiency	requirement must be satisfied prior to	
requirement must be satisfied prior to	commencing the clinical training phase.	
commencing the clinical training phase.		
Criterion 6.7 Enrollment	Criterion 6.7 Enrollment	
Non-matriculated students must meet all	Non-matriculated students must meet all	
entry requirements and course prerequisite	entry requirements and course prerequisite	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
requirements for participation in particular courses with the exception of courses which may be open to the general public. Programs must have clearly defined policies with respect to allowing non-matriculated students to take courses and must ensure that their participation does not adversely affect the quality of instruction.	requirements for participation in particular courses with the exception of courses which may be open to the general public. Programs must have clearly defined policies with respect to allowing non-matriculated students to take courses and must ensure that their participation does not adversely affect the quality of instruction.	
<b>Guideline:</b> All prior learning and transfer equivalencies should be established, articulated and filed, along with the applicant's materials and applied to admission requirement and/or to advanced standing placement, by the start of the first enrollment period and/or before any classes are commenced.	<b>Guideline:</b> All prior learning and transfer equivalencies should be established, articulated and filed, along with the applicant's materials and applied to admission requirement and/or to advanced standing placement, by the start of the first enrollment period and/or before any classes are commenced.	
<b>Guideline:</b> A statement of the applicant's prior experience, which may be considered as an equivalency to part of the entrance requirement or to the program's requirements, should be articulated and filed, along with the applicant's materials, when the applicant is accepted, and before any classes are commenced.	<b>Guideline:</b> A statement of the applicant's prior experience, which may be considered as an equivalency to part of the entrance requirement or to the program's requirements, should be articulated and filed, along with the applicant's materials, when the applicant is accepted, and before any classes are commenced.	
Guideline: The institution's enrollment agreements/documents clearly identify the	Guideline: The institution's enrollment agreements/documents clearly identify the	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
educational offering and assure that each applicant is fully informed of the rights, responsibilities, and obligations of both the student and the institution prior to applicant signature.	educational offering and assure that each applicant is fully informed of the rights, responsibilities, and obligations of both the student and the institution prior to applicant signature.	
<b>Guideline:</b> Tuition (and all additional fees, i.e., applicant/student verification and other distance learning technologies, supervision, etc.) and refund policies are disclosed on all enrollment agreements.	<b>Guideline:</b> Tuition (and all additional fees, i.e., applicant/student verification and other distance learning technologies, supervision, etc.) and refund policies are disclosed on all enrollment agreements.	
Criterion 6.8 Retention and Graduation Rates	Criterion 6.8 Retention and Graduation Rates	One commenter noted that distance education programs can experience lower completion
The program's student retention rate must be a minimum of sixty-five percent (65%) and the graduation rate must be a minimum of fifty percent (50%).	The program's student retention rate must be a minimum of sixty-five percent (65%) and the graduation rate must be a minimum of fifty percent (50%).	rates. The Standards Committee recommends to ACHENA that these minimum retention and graduation rates are maintained as they are quite low and on par with (or lower than) minimum rates from other comparable accreditation bodies.

#### Standard 7: Assessment

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
Standard 7 – Evaluation of Student         and Programmatic Assessment,         Achievement and Satisfaction         The program shall demonstrate a         commitment to student academic and         professional achievement through excellence	Standard 7 – Evaluation of Student and Programmatic Assessment, Achievement and Satisfaction The program shall demonstrate a commitment to student academic and professional achievement through excellence	Language was removed and revised in this section based on feedback from a commenter. The Committee removed redundant/unclear language to help strengthen this section.
in student and programmatic assessment processes. The institution shall demonstrate how its educational objectives and competencies are met and how this enhances the quality and satisfaction of professional education and training obtained by students.	in student and programmatic assessment processes. The institution shall demonstrate how its educational objectives and competencies are met and how this enhances the quality and satisfaction of professional education and training obtained by students.	
Goals and Objectives Programmatic goals and objectives describe the intended achievements of the institution. Course level goals and objectives describe the intended achievements at course level.	Goals and Objectives Programmatic goals and objectives describe the intended educational achievements of the institution. Course level goals and objectives describe the intended educational achievements at the course level.	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
Outcomes	Outcomes	
Programmatic outcomes catalogue the	The school systematically collects and	
overarching "end products" of the program	rigorously analyzes quantifiable and	
and are the evidence for the extent to which	observable evidence of individual and	
successful learning and other institutional	programmatic level learning and growth	
parameters contributed to the achievement	from multiple valid and reliable sources.	
of student competency and stated goals and	Evidence of deficiencies in the achievement	
objectives.	of outcomes initiates a process guided by	
	policies and procedures to improve curricular	
Course level learning outcomes list	and programmatic effectiveness,	
measurable and essential mastered content-	instructional practices, professional	
knowledge—reflecting skills and	development, and support services as	
competencies that students can successfully	needed. Student progress is systematically	
demonstrate upon course completion.	and regularly communicated and maintained	
	on a collaborative basis among students,	
Assessable outcomes at the course and	faculty and administration.	
programmatic levels can be observed and		
evaluated against growing student	An assessment system that provides	
competency and other institutional criteria	accurate information includes an Assessment	
to determine the extent to which stated	Plan that describes a range of fair, objective	
goals and objectives have been attained.	and consistent outcomes and assessment	
	practices measuring students' progress	
The school systematically collects and	regarding relevant knowledge, skills, clinical	
rigorously analyzes quantifiable and	skills, competencies and attitudes. These	
observable evidence of individual and	comprise an important source of data for the	
programmatic level learning and growth	institutional review process and contribute	
from multiple valid and reliable sources.	to the fulfillment of the institution's mission.	
Evidence of deficiencies in the achievement		
of outcomes initiates a process guided by		

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
policies and procedures to improve curricular		
and programmatic effectiveness,		
instructional practices, professional		
development, and support services as		
needed. Progress is systematically and		
regularly communicated and maintained on		
a collaborative basis among students, faculty		
and administration.		
An assessment system that provides		
accurate information includes an Assessment		
Plan that describes a range of fair, objective		
and consistent outcomes and assessment		
practices measuring students' progress		
regarding relevant knowledge, skills, clinical		
skills, competencies and attitudes. These		
comprise an important source of data for the		
institutional review process and contribute		
to the fulfillment of the institution's mission.		
Criterion 7.1 – Measurement of Student	Criterion 7.1 – Measurement of Student	
Achievement	Achievement	
The institution defines standards for student	The institution defines standards for student	
achievement and assesses its performance	achievement and assesses its performance	
against those standards. Through regular	against those standards. Through regular	
and systematic assessment, the institution	and systematic assessment, the institution	
demonstrates that students who complete	demonstrates that students who complete	
programs achieve the identified outcomes	programs achieve the identified outcomes	
and competencies and that the standards for	and competencies and that the standards for	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
student achievement are met. Program and course level learning outcomes describe academic competencies obtained as students progress through the program and define the knowledge and skills that students possess upon its successful completion.	student achievement are met. Program and course level learning outcomes describe academic competencies obtained as students progress through the program and define the knowledge and skills that students possess upon its successful completion.	
<b>Guideline:</b> Assessment processes measure student performance in the professional competencies. The institution uses the information gained from assessments to improve student learning in conjunction with faculty and students.	<b>Guideline:</b> Assessment processes measure student performance in the professional competencies. The institution uses the information gained from assessments to improve student learning in conjunction with faculty and students.	
<b>Guideline:</b> The program shall systematically and sequentially document quantitative and qualitative, direct and indirect as well as formative and summative evaluation processes to measure competency levels as outlined in the standard describing the Program of Study. These may include among others:	<b>Guideline:</b> The program shall systematically and sequentially document quantitative and qualitative, direct and indirect as well as formative and summative evaluation processes to measure competency levels as outlined in the standard describing the Program of Study. These may include among others:	
<ul> <li>Oral and written examinations of didactic material.</li> <li>Clinical performance at all stages of the program</li> <li>Milestone exams</li> </ul>	-Oral and written examinations of didactic material. -Clinical performance at all stages of the program -Milestone exams	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
-Case reports on clinical and differential	-Case reports on clinical and differential	
diagnoses	diagnoses	
-Scientific literature reviews	-Scientific literature reviews	
-Structured observation and evaluation	-Structured observation and evaluation	
-Student case taking and decision-making	-Student case taking and decision-making	
ability	ability	
-Review of patient charts	-Review of patient charts	
-Student self-evaluations and reflection	-Student self-evaluations and reflection	
-Student and patient surveys	-Student and patient surveys	
Assessment practices are listed on course	Assessment practices are listed on course	
syllabi and grading procedures and random	syllabi and grading procedures and random	
samples are available for evaluation.	samples are available for evaluation.	
<b>Guideline:</b> Program Learning Outcomes are comprised of key performance indicators (KPI) such as:	<b>Guideline:</b> Program Learning Outcomes are comprised of key performance indicators (KPI) such as:	
-Minimum 65% programmatic retention rate.	-Minimum 65% programmatic retention rate.	
-Minimum 50% graduation rate in any one	-Minimum 50% graduation rate in any one	
year.	year.	
-% of student numbers completing within 3	-% of student numbers completing within 3	
years – full time.	years – full time.	
-% of student numbers completing within 6	-% of student numbers completing within 6	
years – part time.	years – part time.	
-% of student numbers employed (including	-% of student numbers employed (including	
self employed) within one year.	self employed) within one year.	
-% graduating within 150% of time to	-% graduating within 150% of time to	
completion.	completion.	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
-Evaluation of programmatic and	-Evaluation of programmatic and	
professional competencies.	professional competencies.	
-Alumni satisfaction surveys at a minimum of	-Alumni satisfaction surveys at a minimum of	
every 3 years.	every 3 years.	
-Annual faculty surveys.	-Annual faculty surveys.	
-Faculty training opportunities available.	-Faculty training opportunities available.	
-Key financial ratios.	-Key financial ratios.	
-Matriculation rates	-Matriculation rates.	
The program selects and justifies outcomes obtained.	The program selects and justifies outcomes obtained.	
Guideline: Student achievement metrics are	Guideline: Student achievement metrics are	
formalized, accessible to students and	formalized, accessible to students and	
consistent with the mission. Compliance is	consistent with the mission. Compliance is	
ensured through an internal audit process.	ensured through an internal audit process.	
Guideline: Faculty receive regular training on	Guideline: Faculty receive regular training on	
optimal assessment practices and forms a	optimal assessment practices and forms a	
part of the new faculty orientation process.	part of the new faculty orientation process.	
Guideline: The program tracks remediation	Guideline: The program tracks remediation	
rates and quality that may point out program	rates and quality that may point out program	
weaknesses.	weaknesses.	
Criterion 7.2 – Measurement of Student	Criterion 7.2 – Measurement of Student	Revisions were made based on
Satisfaction	Satisfaction	suggestions by one commenter.

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Guideline: Student satisfaction is measured	Guideline: Student satisfaction is measured	
by regular and comprehensive student	by regular and comprehensive student	
surveys, program retention and pass rates	surveys, program retention and pass rates	
and perception of administrative,	and perception of administrative,	
educational and other support services	educational and other support services	
provided including, as appropriate,	provided including, as appropriate,	
consideration of course completion,	consideration of course completion, state or	
provincial licensing and or duly recognized	provincial licensing and or duly recognized	
certification examinations and job placement	certification examinations and job placement	
rates.	rates (where applicable).	
Student satisfaction is, in part, reflected by	Student satisfaction is, in part, reflected by	
student achievement which can be measured	student achievement which can be measured	
in numerous ways. These may include:	in numerous ways. These may include:	
1-program referrals	1-Program referrals	
2-Program retention rates	2-Program retention rates	
3-Grievance complaints	3-Grievance complaints	
4-Alumni engagement	4-Alumni engagement	
5-Job placement rates (including self	5-Job placement rates (including self	
employment)	employment)	
6-By regular and comprehensive student	6-By regular and comprehensive student	
surveys measuring program satisfaction and	surveys measuring program satisfaction and	
student perception of administrative,	student perception of administrative,	
educational and other support services.	educational and other support services.	
Criterion 7.3 Assessment of Graduates'	Criterion 7.3 Assessment of Graduates'	Revisions were made based on
Success	Success	suggestions by two
		commenters. The last Guideline

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
Graduate success is measured by	Graduate success is measured by	was removed due to
achievement levels on certification exams	achievement levels on certification exams	redundancy, pointed out by a
and job placement, including self-	and job placement (gainful employment in	commenter.
employment rates, if reliable and readily	the profession), including self-employment	
available. Data sources must be provided.	rates, if reliable and readily available. Data sources must be provided.	
Guideline: Reliably sourced success rates on		
certification examinations are provided on	Guideline: Accurate success rates on	
an annual basis.	certification examinations are provided on	
	an annual basis.	
Guideline: Formal and informal alumni		
and/or employer surveys are performed and	Guideline: Formal and informal alumni	
analyzed on an intermittent basis.	and/or employer surveys are performed and	
	analyzed on an intermittent basis.	
Guideline: All programs, regardless of		
location or means of delivery including		
distance education, are consistent with the		
institution's mission, are appropriate to		
higher education and culminate in the		
attainment of identified student learning		
outcomes and the achievement of diplomas,		
employment and transfer to other higher		
education programs.		
Criterion 7.4 Standard Measurement	Criterion 7.4 Standard Measurement	
Equivalent methods and standards of	Equivalent methods and standards of	
student assessment must be applied and	student assessment must be applied and	
demonstrated for all externship and other	demonstrated for all externship and other	
external or outsourced clinical sites.	external or outsourced clinical sites.	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Criterion 7.5 Programmatic Review	Criterion 7.5 Programmatic Review	
Process	Process	
The institution demonstrates a commitment to educational improvement through ongoing attention to defined goals for retention, persistence and completion rates that are appropriate to its mission and student population.	The institution demonstrates a commitment to educational improvement through ongoing attention to defined goals for retention, persistence and completion rates that are appropriate to its mission and student population.	
<b>Guideline:</b> The institution collects and analyzes information on student retention, persistence and completion of programs to make improvements as warranted by the data.	<b>Guideline:</b> The institution collects and analyzes information on student retention, persistence and completion of programs to make improvements as warranted by the data.	
<b>Guideline:</b> The program, with appropriate involvement from all program constituencies, engages in regular and ongoing continuous improvement processes to:	<b>Guideline:</b> The program, with appropriate involvement from all program constituencies, engages in regular and ongoing continuous improvement processes to:	
<ul> <li>1 – Ensure its effectiveness in achieving program goals, objectives and outcomes.</li> <li>2 – Ensure that policies and procedures are revised as necessary to ensure a reliable and representative feedback loop.</li> <li>3 - The program demonstrates commitment to excellence through periodic and</li> </ul>	<ul> <li>1 – Ensure its effectiveness in achieving program goals, objectives and outcomes.</li> <li>2 – Ensure that policies and procedures are revised as necessary to ensure a reliable and representative feedback loop.</li> <li>3 - The program demonstrates commitment to excellence through periodic and</li> </ul>	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
systematic reviews of the effectiveness and	systematic reviews of the effectiveness and	
suitability of its goals and educational	suitability of its goals and educational	
objectives, training model, mode of delivery	objectives, training model, mode of delivery	
and appropriateness.	and appropriateness.	
Criterion 7.6 Assessment Practices for	Criterion 7.6 Assessment Practices for	
Distance Learning Students	Distance Learning Students	
The program must have policies and	The program must have policies and	
procedures to verify the authenticity of	procedures to verify the authenticity of	
distance learning student's work on exams,	distance learning student's work on exams,	
papers and casework. Programs that meet	papers and casework. Programs that meet	
this standard would likely employ methods	this standard would likely employ methods	
such as a secure login and pass code;	such as a secure login and pass code;	
proctored examinations; and use of new or	proctored examinations; and use of new or	
other technologies and practices that are	other technologies and practices that are	
effective in verifying student identity.	effective in verifying student identity.	
Guideline: Assessment practices for distance	Guideline: Assessment practices for distance	
learning students must be of comparable	learning students must be of comparable	
intensity and comprehensiveness as	intensity and comprehensiveness as	
assessment practices in place for on-campus	assessment practices in place for on-campus	
students.	students.	
Guideline: Institutions and programs that	Guideline: Institutions and programs that	
employ distance learning must have a	employ distance learning must have a	
process for direct observation and	process for direct observation and	
assessment of the clinical skills of distance	assessment of the clinical skills of distance	
learning students. This should include	learning students. This should include	
strategies such as: use of real-time	strategies such as use of real-time	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
synchronous distance learning technologies that allow for direct supervisor's observation and assessment of the student's clinical skills; or, supervisor's review of videotaped sessions in which one camera is focused on the student and another camera is focused on the client; or similar arrangement.	synchronous distance learning technologies that allow for direct supervisor's observation and assessment of the student's clinical skills; or, supervisor's review of videotaped sessions in which one camera is focused on the student and another camera is focused on the client; or similar arrangement.	
<b>Guideline:</b> Institutions and programs that employ distance learning must directly observe a sufficient body of the student's clinical case work in order to effectively assess the student's skills and provide clinical mentoring. Observation must be of sufficient intensity and frequency to ensure that, by graduation, students have attained competency in the full range of skills required for practice.	<b>Guideline:</b> Institutions and programs that employ distance learning must directly observe a sufficient body of the student's clinical case work in order to effectively assess the student's skills and provide clinical mentoring. Observation must be of sufficient intensity and frequency to ensure that, by graduation, students have attained competency in the full range of skills required for practice.	

Standard 8: Program of Study

No proposed revisions to Standard 8 at this time.

# Standard 9: Faculty

Proposed Revised Standard	Updated Standard	<b>Comments and Response</b>
Standard 9 - Faculty Qualifications	Standard 9 - Faculty Qualifications	
Institutions demonstrate that qualified individuals serve in all relevant academic roles and contribute to the academic process. The program should provide for a sufficient number of qualified faculty to support the program. Professional training opportunities are monitored and made available where possible.	Institutions demonstrate that qualified individuals serve in all relevant academic roles and contribute to the academic process. The program should provide for a sufficient number of qualified faculty to support the program. Professional training opportunities are monitored and made available where possible.	
Criterion 9.1 Faculty Size	Criterion 9.1 Faculty Size	
The program maintains a sufficient number of faculty to meet program needs.	The program maintains a sufficient number of faculty to meet program needs.	
<b>Criterion 9.2</b> Faculty Qualifications All faculty members demonstrate an appropriate level of education and experience to achieve educational objectives and to be able to provide individualized instruction to students as needed.	<b>Criterion 9.2</b> Faculty Qualifications All faculty members demonstrate an appropriate level of education and experience to support the institution's achievement of its educational objectives.	Revisions were made here for clarity based on feedback from one commenter.
<b>Guideline:</b> Qualifications for core faculty include the following:	<b>Guideline:</b> Qualifications for core faculty include the following:	

Proposed Revised Standard	Updated Standard	Comments and Response
<ol> <li>Completion of a full professional program in homeopathy.</li> <li>Completion of certification equivalent to that provided by The Council for Homeopathic Certification.</li> <li>A minimum of three years of professional practice experience.</li> </ol>	<ol> <li>Completion of a full professional program in homeopathy.</li> <li>Completion of certification equivalent to that provided by The Council for Homeopathic Certification.</li> <li>A minimum of three years of professional practice experience.</li> </ol>	
<b>Guideline:</b> The program implements appropriate policies and procedures and maintain hiring documents that verify the personal and professional credentials of its faculty and maintain such in the faculty member's file.	<b>Guideline:</b> The program implements appropriate policies and procedures and maintain hiring documents that verify the personal and professional credentials of its faculty and maintain such in the faculty member's file.	
Institutions consider pertinent legal requirements in the areas of non- discrimination, equal opportunity, and affirmative action employment practices.	Institutions consider pertinent legal requirements in the areas of non- discrimination, equal opportunity, and affirmative action employment practices.	
<b>Guideline:</b> Faculty resumes, official transcripts, copies of applicable licenses and other credentials are kept on file. Contracts should clearly specify responsibilities.	<b>Guideline:</b> Faculty resumes, official transcripts, copies of applicable licenses and other credentials are kept on file. Contracts should clearly specify responsibilities.	
<b>Criterion 9.3</b> - Professional Conditions of Service	<b>Criterion 9.3</b> - Professional Conditions of Service	

Proposed Revised Standard	Updated Standard	<b>Comments and Response</b>
Employment conditions are fair and	Employment conditions are fair and	
equitable. Members are provided with	equitable. Members are provided with	
opportunities for professional growth and	opportunities for professional growth and	
development as well as academic freedom.	development as well as academic freedom.	
Guideline: Provisions for benefits and/or	Guideline: Provisions for benefits and/or	
professional development are reviewed	professional development are reviewed	
periodically.	periodically.	
Guideline: The institution has an academic	Guideline: The institution has an academic	
freedom policy in place.	freedom policy in place.	
Guideline: The institution regularly evaluates	Guideline: The institution regularly evaluates	
faculty performance using clear and	faculty performance using clear and	
consistent procedures and is carried out on a	consistent procedures and is carried out on a	
regular basis.	regular basis.	
Criterion 9.4 – Faculty Training	Criterion 9.4 – Faculty Training	
Continuous training on policies, student	Continuous training on policies, student	
needs, instructional methods and	needs, instructional methods and	
technologies is available and required.	technologies is available and required.	
Criterion 9.5 – Communication	Criterion 9.5 – Communication	
The institution promotes a climate of regular	The institution promotes a climate of regular	
and open communication among members of	and open communication among members of	
the faculty and between the faculty and	the faculty and between the faculty and	
administrative officers of the institution.	administrative officers of the institution.	

Proposed Revised Standard	Updated Standard	Comments and Response
<b>Guideline:</b> A culture of commitment and collaboration among administrators, faculty, and staff to provide quality educational programs for continued growth is apparent.	<b>Guideline:</b> A culture of commitment and collaboration among administrators, faculty, and staff to provide quality educational programs for continued growth is apparent.	
<b>Guideline</b> : The faculty is encouraged to form an independent faculty body and hold meetings on a regular basis to consider relevant issues, educational policies and teaching/grading procedures.	<b>Guideline</b> : The faculty is encouraged to form an independent faculty body and hold meetings on a regular basis to consider relevant issues, educational policies and teaching/grading procedures.	
<b>Guideline</b> : Minutes of faculty meetings are maintained and stored within the institution.	<b>Guideline</b> : Minutes of faculty meetings are maintained and stored within the institution.	

### **Standard 10: Student Services**

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Standard 10 - Student Services	Standard 10 - Student Services	
The program provides accessible and effective student services and student support programming that reflect the program's objectives, create good student morale, and assist students in the achievement of personal and professional growth while making progress toward their educational goals.	The program provides accessible and effective student services and student support programming that reflect the program's objectives, create good student morale, and assist students in the achievement of personal and professional growth while making progress toward their educational goals.	
Criterion 10.1 Fulfillment of objectives Student services and programming fulfills the objectives of the program and be guided by a philosophy that reflects the institution's mission and special character. Guideline: The Student Services program systematically identifies the characteristics and needs of its student population and shows evidence of designing, implementing, reviewing and revising programming to meet these needs.	Criterion 10.1 Fulfillment of objectives Student services and programming fulfills the objectives of the program and be guided by a philosophy that reflects the institution's mission and special character. Guideline: The Student Services program systematically identifies the characteristics and needs of its student population and shows evidence of designing, implementing, reviewing and revising programming to meet these needs.	Language in Guideline 2 was deleted due to redundancy based on commenter feedback.

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
<b>Guideline:</b> The program assures all students, including distance learning students, have access to effective counseling, advisement, orientation, financial aid, career development and placement support services. The organization of the services, as well as the resources and staffing provided, is determined by the institution as long as provision for all of the above services is made.	Guideline: The program assures all students, including distance learning students, have access to effective counseling, advisement, orientation, financial aid, career development and placement support services. Guideline: In providing services, the program adheres to both the spirit and intent of equal opportunity and its own goals for diversity, equity, and inclusion.	
<b>Guideline:</b> In providing services, the program adheres to both the spirit and intent of equal opportunity and its own goals for diversity, equity, and inclusion.		
<b>Criterion 10.2 – Published student policies</b> The program has a statement of student rights, privileges and responsibilities of students and of disciplinary proceedings for violations of those responsibilities. This statement is made available to students through the catalog, student handbook and other appropriate means.	<b>Criterion 10.2 – Published student policies</b> The program has a statement of student rights, privileges and responsibilities of students and of disciplinary proceedings for violations of those responsibilities. This statement is made available to students through the catalog, student handbook and other appropriate means.	
<b>Guideline</b> : There is a fair and formal process for the faculty or administration to	<b>Guideline</b> : There is a fair and formal process for the faculty or administration to	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
follow when taking any disciplinary action	follow when taking any disciplinary action	
that affects the enrollment status of a	that affects the enrollment status of a	
student.	student.	
Guideline: The enrollment, cancellation,	Guideline: The enrollment, cancellation,	
and refund policies comply with applicable	and refund policies comply with applicable	
federal and state laws and regulations.	federal and state laws and regulations.	
Criterion 10.3 – Inclusion of Student Voice	Criterion 10.3 – Inclusion of Student Voice	
Provision is made for obtaining student	Provision is made for obtaining student	
perceptions in the decision- making process	perceptions in the decision- making process	
of the institution.	of the institution.	
Guideline: A student(s) is part of and	Guideline: A student(s) is part of and	
participates in a formal institutional	participates in a formal institutional	
decision-making body	decision-making body.	
Guideline: The interests of students and	Guideline: The interests of students and	
alumni in institutional development are	alumni in institutional developmentare	
encouraged.	encouraged.	
Guideline: In order to develop community,	Guideline: In order to develop community,	
institutional policies and procedures foster	institutional policies and procedures foster	
associations among students, faculty, and	associations among students, faculty, and	
the administration.	the administration.	
Criterion 10.4 Grievances	Criterion 10.4 Grievances	
The program has fair and efficient	The program has fair and efficient	
procedures for reviewing and responding to	procedures for reviewing and responding to	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
grievances made by students and must	grievances made by students and must	
maintain a record of all student complaints	maintain a record of all student complaints	
during the preceding ten-year period	during the preceding ten-year period	
demonstrating that these complaints were	demonstrating that these complaints were	
handled in a fair and equitable manner.	handled in a fair and equitable manner.	
The process includes genuine attempts at	The process includes genuine attempts at	
resolving conflict prior to any grievance	resolving conflict prior to any grievance	
process. Provision is made for the	process. Provision is made for the	
disclosure of the evidence on which the	disclosure of the evidence on which the	
action is based and an opportunity for the	action is based and an opportunity for the	
student to respond. Actions are taken in a	student to respond. Actions are taken in a	
timely manner, be fair, orderly, equitable	timely manner, be fair, orderly, equitable	
and organized.	and organized.	
The program discloses the Commission's	The program discloses the Commission's	
contact information in its published policy	contact information in its published policy	
on student complaints so that, if upon the	on student complaints so that, if upon the	
program's disposition of a legitimate	program's disposition of a legitimate	
student complaint, the student is not	student complaint, the student is not	
satisfied that the program has adhered to	satisfied that the program has adhered to	
its policy or been fair in its handling of the	its policy or been fair in its handling of the	
complaint, the student may contact the	complaint, the student may contact the	
Commission. ACHENA's role in these	Commission. ACHENA's role in these	
matters relates specifically to the school's	matters relates specifically to the school's	
application of their own policies and	application of their own policies and	
procedures.	procedures.	

## **Standard 11: Physical Facilities**

Past Standard	Updated and Adopted Standard	Comments and Response
Standard 11 - Infrastructure The program provides facilities that are safe, accessible, functional, flexible, appropriately maintained and sufficient to house the program, to provide for effective functioning, and to accommodate the staff and the student body. The facilities shall include a clinic and, if applicable, a homeopathic dispensary; appropriate media and learning equipment adequate for the educational programs offered. The program demonstrates that physical and IT resources are adequate to meet the school's mission and that adequate data recovery and business continuity planning exists.	Standard 11 - Infrastructure The program provides facilities that are safe, accessible, functional, flexible, appropriately maintained and sufficient to house the program, to provide for effective functioning, and to accommodate the staff and the student body. The institution provides an in- person and/or virtual clinic and, if applicable, a homeopathic dispensary; appropriate media and learning equipment adequate for the educational programs offered. The program demonstrates that physical and IT resources are adequate to meet the school's mission and that adequate data recovery and business continuity planning exists.	Revision was made here based on request for clarification from one commenter.
Criterion 11.1 Virtual and Physical	Criterion 11.1 Virtual and Physical	
Facilities and Equipment for Students	Facilities and Equipment for Students	
Adequate physical facilities, such as	Adequate physical facilities, such as	
classroom, clinic, and conference and	classroom, clinic, and conference and	
study areas, and/or virtual spaces and	study areas, and/or virtual spaces and	

Past Standard	Updated and Adopted Standard	<b>Comments and Response</b>
appropriate media and learning	appropriate media and learning	
equipment are provided that are	equipment are provided that are	
appropriate to its curriculum and size in	appropriate to its curriculum and size in	
service of the school's mission.	service of the school's mission.	
Criterion 11.2 - Compliance with Safety	Criterion 11.2 - Compliance with Safety	
Standards	Standards	
Program delivery infrastructure meets all	Program delivery infrastructure meets all	
federal, state, and local fire, safety,	federal, state, and local fire, safety,	
workplace and health standards and must	workplace and health standards and must	
have an emergency preparedness plan in	have an emergency preparedness plan in	
place.	place.	
Criterion 11.3 – Upkeep and Capital	Criterion 11.3 – Upkeep and Capital	
Improvement Plans	Improvement Plans	
Provisions for the regularly scheduled	Provisions for the regularly scheduled	
cleaning, repair and maintenance and	cleaning, repair and maintenance and	
improvement of buildings and grounds,	improvement of buildings and grounds,	
and specific responsibilities for the care of	and specific responsibilities for the care of	
grounds, security, fire protection, utilities	grounds, security, fire protection, utilities	
and plant upkeep are maintained	and plant upkeep are maintained	
appropriately. Additionally, provisions for	appropriately. Additionally, provisions for	
systems protections and maintenance, IT	systems protections and maintenance, IT	
support and contingency structures, and	support and contingency structures, and	
regular review of those systems and	regular review of those systems and	
protections are maintained.	protections are maintained.	
Criterion 11.4 Staff and faculty space and	Criterion 11.4 Staff and faculty space and	
equipment	equipment	

Past Standard	Updated and Adopted Standard	Comments and Response
Adequate physical facilities, such as classroom, clinic, and conference and study areas, and/or virtual spaces and appropriate media and learning equipment are available for administrative and faculty support.	Adequate physical facilities, such as classroom, clinic, and conference and study areas, and/or virtual spaces and appropriate media and learning equipment are available for administrative and faculty support.	
<b>Guideline</b> : Facilities and equipment are adequate to maintain and process records.	<b>Guideline</b> : Facilities and equipment are adequate to maintain and process records.	
Criterion 11.5 - Clinic space and equipment	Criterion 11.5 - Clinic space and equipment	
The program provides clinic space with sufficient and well-maintained equipment and facilities.	The program provides an in-person and/or virtual clinic space with sufficient and well-maintained equipment and facilities.	

#### **Standard 12: Financial Resources**

Past Standard	Updated Standard	Comments and Response
Standard 12 - Financial Resources	Standard 12 - Financial Resources	
The program has an adequate financial	The program has an adequate financial	
base for existing program commitments,	base for existing program commitments,	
shall provide evidence of adequate	shall provide evidence of adequate	
financial planning and shall have an	financial planning and shall have an	
appropriate financial management system.	appropriate financial management system.	
The program is financially stable, with	The program is financially stable, with	
resources sufficient to carry out its	resources sufficient to carry out its	
objectives, to complete the instruction and	objectives, to complete the instruction and	
graduate all of enrollees, to support	graduate all of enrollees, to support	
adequately its programs and activities, and	adequately its programs and activities, and	
to support programmatic improvement	to support programmatic improvement	
now and in the foreseeable future. In the	now and in the foreseeable future. In the	
case of a program in an institution that is a	case of a program in an institution that is a	
sole-proprietorship, books and bank	sole-proprietorship, books and bank	
accounts for the program are required,	accounts for the program are required,	
and those books shall be distinct from the	and those books shall be distinct from the	
books and accounts for any other	books and accounts for any other	
enterprise owned by the proprietor.	enterprise owned by the proprietor.	
The institution's financial planning,	The institution's financial planning,	
including contingency planning, is	including contingency planning, is	
integrated with overall strategic planning	integrated with overall strategic planning	
and evaluation processes.	and evaluation processes.	

Past Standard	Updated Standard	<b>Comments and Response</b>
Criterion 12.1 Resources	Criterion 12.1 Resources	
The institution has sufficient planning for,	The institution has sufficient planning for,	
management and allocation of the	management and allocation of the	
resources necessary to achieve its mission.	resources necessary to achieve its mission.	
Guideline 1: The program has the financial	Guideline: The program has the financial	
capacity and contingency planning to	capacity and contingency planning to	
respond to financial emergencies or	respond to financial emergencies or	
unforeseen occurrences. If an accumulated	unforeseen occurrences. If an accumulated	
deficit has been recorded, a realistic plan	deficit has been recorded, a realistic plan	
with reasonable and attainable	with reasonable and attainable	
benchmarks to eliminate the deficit must	benchmarks to eliminate the deficit must	
be clearly presented, understood, and	be clearly presented, understood, and	
approved by the governing entity. If a	approved by the governing entity. If a	
program has an operating loss as	program has an operating loss as	
measured by financial documents	measured by financial documents	
submitted in Annual Reports for three	submitted in Annual Reports for three	
consecutive years, it will be required to	consecutive years, it will be required to	
submit a financial recovery plan.	submit a financial recovery plan.	
Guideline 2: The program devotes	Guideline: The program devotes sufficient	
sufficient resources to enhance its	resources to enhance its information and	
information and technological resources	technological resources including, where	
including, where applicable, online	applicable, online instructional design and	
instructional design and training for	training for faculty, training for	
faculty, training for faculty/students in	faculty/students in online learning	
online learning technologies and in the	technologies and in the development and	
development and maintenance of online	maintenance of online learning	

Past Standard	Updated Standard	<b>Comments and Response</b>	
learning technologies and digital learning	technologies and digital learning		
resources.	resources.		
Criterion 12.2 - Control	Criterion 12.2 - Control	A grammatical revision was made here based on a	
The institution has control of its financial	The institution has control of its financial	commenter's suggestion.	
resources and budgetary processes and be	resources and budgetary processes and is		
free from undue influence or pressure	free from undue influence or pressure		
from external funding sources or agencies.	from external funding sources or agencies.		
In multi-purpose institutions, the program	In multi-purpose institutions, the program		
must have sufficient control over its	must have sufficient control over its		
program budget.	program budget.		
Criterion 12.3 - Expenditure	Criterion 12.3 - Expenditure		
The income of the program is expended to	The income of the program is expended to		
provide adequately for instruction,	provide adequately for instruction,		
administration, learning resources, student	administration, learning resources, student		
services and activities, maintenance,	services and activities, maintenance,		
equipment, supplies, and other specific	equipment, supplies, and other specific		
functions that are consistent with the goals	functions that are consistent with the goals		
of the program.	of the program.		
Criterion 12.4 - Budgetary Process	Criterion 12.4 - Budgetary Process		
The process by which the program's	The process by which the program's		
annual budget is established, and	annual budget is established, and		
resources allocated, is clearly defined and	resources allocated, is clearly defined and		
consistently implemented. It provides a	consistently implemented. It provides a		
realistic projection of the program's	realistic projection of the program's		
revenue and expenditures. The budget is	revenue and expenditures. The budget is		

Past Standard	Updated Standard	<b>Comments and Response</b>
reviewed and approved by the institution's	reviewed and approved by the institution's	
governing entity.	governing entity.	
Guideline 1: The program projects its	Guideline: The program projects its	
expenditures and revenues for at least a	expenditures and revenues for at least a	
three-year period. The budget shall include	three-year period. The budget shall include	
notes explaining the assumptions on which	notes explaining the assumptions on which	
the projected figures are based, e.g., the	the projected figures are based, e.g., the	
basis for increases or decreases in revenue	basis for increases or decreases in revenue	
or expenses.	or expenses.	
Criterion 12.5 - Management	Criterion 12.5 - Management	
An accrual basis of accounting is required.	An accrual basis of accounting is required.	
The financial management system must be	The financial management system must be	
set up to allow for a full audit by an	set up to allow for a full audit by an	
outside independent licensed CPA if, in	outside independent licensed CPA if, in	
ACHENA's opinion, an audit is deemed	ACHENA's opinion, an audit is deemed	
necessary. Each year, a financial statement	necessary. Each year, a financial statement	
must be prepared by schools and	must be prepared by schools and	
submitted with its Annual Report. This	submitted with its Annual Report. This	
yearly financial report must include:	yearly financial report must include:	
<ul> <li>Most recent Tax Return</li> </ul>	<ul> <li>Most recent Tax Return</li> </ul>	
(prepared by a licensed CPA)	(prepared by a licensed CPA)	
<ul> <li>Current Budget, Balance Sheet,</li> </ul>	<ul> <li>Current Budget, Balance Sheet,</li> </ul>	
Profit & Loss Statement (may be	Profit & Loss Statement (may be	

Past Standard	Updated Standard	<b>Comments and Response</b>
prepared by bookkeeper or	prepared by bookkeeper or	
accountant).	accountant).	
These documents must be reviewed for	These documents must be reviewed for	
accuracy by the appropriate individuals or	accuracy by the appropriate individuals or	
responsible groups within the institution.	responsible groups within the institution.	
The above documents must be submitted	The above documents must be submitted	
with an affirmation sheet signed by the	with an affirmation sheet signed by the	
Director of the institution.	Director of the institution.	
Criterion 12.6 - Evaluation of the School's	Criterion 12.6 - Evaluation of the School's	
Finances	Finances	
To provide a detailed and accurate picture	To provide a detailed and accurate picture	
of the financial status of the program, new	of the financial status of the program, new	
applicants and applicants for	applicants and applicants for	
reaccreditation must provide the	reaccreditation must provide the	
following:	following:	
• A current Financial Review (prepared by	• A current Financial Review (prepared by	
a licensed CPA).	a licensed CPA).	
• Three years most recent tax returns	<ul> <li>Three years most recent tax returns</li> </ul>	
(prepared by a licensed CPA).	(prepared by a licensed CPA).	
<ul> <li>Current budget and two years projected</li> </ul>	• Current budget and two years projected	
budgets (may be prepared by bookkeeper	budgets (may be prepared by bookkeeper	
or accountant).	or accountant).	

Past Standard	Updated Standard	Comments and Response
• Current Balance Sheet and two preceding years Balance Sheets (may be prepared by bookkeeper or accountant).	<ul> <li>Current Balance Sheet and two preceding years Balance Sheets (may be prepared by bookkeeper or accountant).</li> </ul>	
• Current Profit & Loss Statements and two preceding years Profit & Loss statements (may be prepared by bookkeeper or accountant).	• Current Profit & Loss Statements and two preceding years Profit & Loss statements (may be prepared by bookkeeper or accountant).	
These documents must be reviewed for accuracy by the appropriate individuals or responsible groups within the institution. The above documents must be submitted with an affirmation sheet signed by the Director of the institution.	These documents must be reviewed for accuracy by the appropriate individuals or responsible groups within the institution. The above documents must be submitted with an affirmation sheet signed by the Director of the institution.	
Criterion 12.7 - Indebtedness	Criterion 12.7 - Indebtedness	
Adequate resources are available to meet debt-service requirements of short-term and long-term indebtedness without adversely impacting the quality of the program.	Adequate resources are available to meet debt-service requirements of short-term and long-term indebtedness without adversely impacting the quality of the program.	
Criterion 12.8 - Financial aid operations	Criterion 12.8 - Financial aid operations	
If the program utilizes public resources for financial aid, the financial aid operation is	If the program utilizes public resources for financial aid, the financial aid operation is	

Past Standard	Updated Standard	Comments and Response	
capably administered as documented by	capably administered as documented by		
reports from the funding source.	reports from the funding source.		
If the program utilizes private resources	If the program utilizes private resources		
for financial aid in the form of scholarships	for financial aid in the form of scholarships		
or work study, the financial aid operation	or work study, the financial aid operation		
must be capably administered as	must be capably administered as		
documented by reports.	documented by reports.		
Criterion 12.9 - Student Loan Default rate	Criterion 12.9 - Student Loan Default rate		
If the program's cohort default rate	If the program's cohort default rate		
exceeds 25%, or if it is 15% or higher and	exceeds 25%, or if it is 15% or higher and		
has increased 50% over the prior year's	has increased 50% over the prior year's		
rate, the Commission shall review the	rate, the Commission shall review the		
program to determine if it remains in	program to determine if it remains in		
compliance with the accreditation criteria.	compliance with the accreditation criteria.		
Criterion 12.10 - Refund Policy	Criterion 12.10 - Refund Policy		
The program clearly defines and uniformly	The program clearly defines and uniformly		
follows a fair and equitable refund policy	follows a fair and equitable refund policy		
for unearned tuition that complies with	for unearned tuition that complies with		
applicable state and federal laws and	applicable state and federal laws and		
regulations.	regulations.		
Guideline: The pro rata amount may be	Guideline: The pro rata amount may be		
computed by using the ratio of the number	computed by using the ratio of the number		
of weeks of instruction completed to the	of weeks of instruction completed to the		

Past Standard	Updated Standard	<b>Comments and Response</b>
total number of weeks of instruction	total number of weeks of instruction	
scheduled for the period of enrollment. In	scheduled for the period of enrollment. In	
some jurisdictions the state or provincial	some jurisdictions the state or provincial	
licensing guidelines take precedence.	licensing guidelines take precedence.	
Guideline: Refund computations should	Guideline: Refund computations should	
apply to the stated tuition charges	apply to the stated tuition charges	
attributable to each school term	attributable to each school term	
(semester, quarter, trimester, etc.)	(semester, quarter, trimester, etc.)	

# Standard 13: Publications and Advertising

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
Standard 13 - Publication and	Standard 13 - Publication and	
Advertising	Advertising	
Publications, advertising, and other communications of information concerning the institution's programs, services, activities, and personnel fully disclose the institution's educational offerings and represent them to students, faculty, staff, the public and the Commission in language that is accurate, honest, clear, and unambiguous.	Publications, advertising, and other communications of information concerning the institution's programs, services, activities, and personnel fully disclose the institution's educational offerings and represent them to students, faculty, staff, the public and the Commission in language that is accurate, honest, clear, and unambiguous.	
Criterion 13.1 - Completeness and Accuracy	Criterion 13.1 - Completeness and Accuracy	
The institution publishes, and makes available to students and to the general public (where applicable), an Academic Catalogue or comparable official publication that honestly and accurately sets forth its:	The institution publishes, and makes available to students and to the general public (where applicable), an Academic Catalogue or comparable official publication that honestly and accurately sets forth its:	
<ul> <li>Current purposes and educational objectives</li> <li>Entrance requirements and procedures</li> <li>Admissions and transfer credit policies</li> </ul>	<ul> <li>Current purposes and educational objectives</li> <li>Entrance requirements and procedures</li> <li>Admissions and transfer credit policies</li> </ul>	

Pr	oposed Revised Standard	U	odated and Adopted Standard	<b>Comments and Response</b>
•	Rules and regulations for conduct and attendance	•	Rules and regulations for conduct and attendance	
•	Opportunities and requirements for	•	Opportunities and requirements for	
	financial aid (if applicable)		financial aid (if applicable)	
•	Procedures for discipline and or dismissal	•	Procedures for discipline and or dismissal	
	(for academic and other reasons)		(for academic and other reasons)	
•	Grievance procedures for students	•	Grievance procedures for students	
•	Grading policy	•	Grading policy	
•	Fees and equitable refund policies	•	Fees and equitable refund policies	
•	Program completion and performance	•	Program completion and performance	
	requirements		requirements	
•	Members of the administration	•	Members of the administration	
•	Professional education and qualifications	•	Professional education and qualifications	
	of full- and part-time faculty (If degrees		of full- and part-time faculty (If degrees	
	are listed, the institution from which the		are listed, the institution from which the	
	higher degree was issued must be listed;		higher degree was issued must be listed;	
	when indicating an earned doctorate,		when indicating an earned doctorate,	
	designation of the country of origin,		designation of the country of origin,	
	other than the U.S., in which the degree		other than the U.S., in which the degree	
	is conferred shall be listed, e.g., Ph.D.		is conferred shall be listed, e.g., Ph.D.	
	(UK), M.D. (China)		(UK), M.D. (China)	
•	Members of the governing and advisory	•	Members of the governing and advisory	
	boards		boards	
•	Non-discrimination, diversity, equity, and	•	Non-discrimination, diversity, equity, and	
	inclusion policies		inclusion policies	
•	Curriculum with course descriptions of	•	Curriculum with course descriptions of	
	each course		each course	
•	Academic calendar	•	Academic calendar	
•	Course schedule	•	Course schedule	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
<ul> <li>Description of each academic program and course of study</li> <li>Description of the learning and other physical resources</li> <li>Sources from which students and prospective students can obtain the legal requirements for certification or licensure and entry into the profession in the state in which the program is located. The program shall also state whether its graduates are eligible for licensure in the state in which the program is located.</li> </ul>	<ul> <li>Description of each academic program and course of study</li> <li>Description of the learning and other physical resources</li> <li>Sources from which students and prospective students can obtain the legal requirements for certification or licensure and entry into the profession in the state in which the program is located. The program shall also state whether its graduates are eligible for licensure in the state in which the program is located.</li> </ul>	
The institution publishes, and makes available to students and to the general public (where applicable), a Clinical Training Handbook or comparable official publication that accurately sets forth its:	The institution publishes, and makes available to students and to the general public (where applicable), a Clinical Training Handbook or comparable official publication that accurately sets forth its:	
<ul> <li>Clinical and supervision training hour requirements</li> <li>Synchronous, asynchronous and live clinical training model</li> <li>Clinical entrance requirements</li> <li>Clinical competencies required for graduation</li> <li>Clinical record-keeping requirements</li> </ul>	<ul> <li>Clinical and supervision training hour requirements</li> <li>Synchronous, asynchronous and live clinical training model</li> <li>Clinical entrance requirements</li> <li>Clinical competencies required for graduation</li> <li>Clinical record-keeping requirements</li> </ul>	

Proposed Revised Standard	Updated and Adopted Standard	Comments and Response
Direct and indirect supervision requirements	<ul> <li>Direct and indirect supervision requirements</li> </ul>	
Criterion 13.2 - Accurate disclosure	Criterion 13.2 - Accurate disclosure	
Programs, courses, services, and personnel	Programs, courses, services, and personnel	
not available during a given academic year	not available during a given academic year	
are identified clearly.	are identified clearly.	
Criterion 13.3 - Representation of opportunities	Criterion 13.3 - Representation of opportunities	
Publications and advertising do not	Publications and advertising do not	
misrepresent employment, career, or	misrepresent employment, career, or	
certification opportunities.	certification opportunities.	
Criterion 13.4 - Status with ACHENA	Criterion 13.4 - Status with ACHENA	
The program accurately reports its	The program accurately reports its	
accreditation status and relationship with	accreditation status and relationship with	
the Commission according to the statements	the Commission according to the statements	
provided to it by the Commission.	provided to it by the Commission.	

## Standard 14: Library and Learning Resources

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
Standard 14 - Library and Learning	Standard 14 - Library and Learning	
Resources	Resources	
The institution provides access to library and information resources, services, facilities, qualified staff and associated technologies sufficient to support its teaching and learning objectives and its research and public service mission as appropriate.	The institution provides access to library and information resources, services, facilities, qualified staff and associated technologies sufficient to support its teaching and learning objectives and its research and public service mission as appropriate.	
Criterion 14.1 - Appropriate Resources	Criterion 14.1 - Appropriate Resources	
The library's materials, services, and related equipment and technologies facilitate and improve learning, foster critical inquiry and intellectual development, and support the educational program.	The library's materials, services, and related equipment and technologies facilitate and improve learning, foster critical inquiry and intellectual development, and support the educational program.	
<b>Guideline:</b> The library is housed in a convenient physical or digital location, is available to students, faculty, and the community, as appropriate, and provides an atmosphere conducive to study and research.	<b>Guideline:</b> The library is housed in a convenient physical or digital location, is available to students, faculty, and the community, as appropriate, and provides an atmosphere conducive to study and research.	
Guideline: Institutions and programs offering both in-person and distance	Guideline: Institutions and programs offering both in-person and distance	

Proposed Revised Standard	Updated and Adopted Standard	<b>Comments and Response</b>
education ensure that distance learning students have digital access to equivalent materials available in the library and/or borrowing access of printed library materials.	education ensure that distance learning students have digital access to equivalent materials available in the library and/or borrowing access of printed library materials.	
Criterion 14.2 - Access	Criterion 14.2 - Access	
Physical and digital library facilities are constructed and maintained in accordance with legal requirements to ensure access, safety, security, and a healthy environment with consideration for environmental and ecological concerns.	Physical and digital library facilities are constructed and maintained in accordance with legal requirements to ensure access, safety, security, and a healthy environment with consideration for environmental and ecological concerns.	
<b>Guideline:</b> Programs offering both in-person and distance education ensure that distance learning students have digital access to equivalent materials available to in-person students in the library and/or borrowing access of printed library materials.	<b>Guideline:</b> Programs offering both in-person and distance education ensure that distance learning students have digital access to equivalent materials available to in-person students in the library and/or borrowing access of printed library materials.	
<b>Guideline:</b> Programs show evidence of working to meet the varied physical and/or learning needs of students by providing accommodations of special access where requested, i.e., assistive equipment and software.	<b>Guideline:</b> Programs show evidence of working to meet the varied physical and/or learning needs of students by providing accommodations of special access where requested, i.e., assistive equipment and software.	