

**Educational Standards and Practice Competencies for the
Professional Practitioner of Homeopathy in North America**

**SUMMARY OF COMMENTS AND DELIBERATIONS/ REVISIONS
October, 2022**

Background

In late 2020, early 2021, representatives from the Accreditation Commission for Homeopathic Education in North America (ACHENA), the Council for Homeopathic Certification (CHC), and the North American Society of Homeopaths (NASH) convened to plan an inclusive process for reviewing and updating the document titled ***Standards for Homeopathic Education and Competencies for the Professional Homeopathic Practitioner in North America*** (hereafter referred to as the S&C Document). In the midst of the COVID-19 pandemic, when an in-person summit was not advised, an inclusive, virtual process for updating the document was established. In February, and again in March of 2021, formal invitations were distributed throughout the homeopathy community requesting broad participation in the process. An S&C Steering Committee was established and comprised of members of ACHENA, CHC, NASH and other community leaders who responded to the call participation. See Attachment 1 for a list of Steering Committee members. The call for participation resulted in the creation of 3 distinct work groups and included participation of more than 25 subject matter experts (SME).

The work groups addressed the following topics:

- Group 1: Changes to the Skills, Knowledge, Attributes, Qualities, Values and Attitudes (11 SMEs);
- Group 2: Entry into the homeopathy community, roles and educational endpoints (9 SMEs);
- Group 3: Clinical training hours, changes in learning and health technologies (6 SMEs).

The Steering Committee compiled the contributions of each workgroup into one document that was posted for a 6-week public comment period which concluded February 18, 2022. The public comment period was announced via ACHENA's email distribution list, the National Center for Homeopathy's E-newsletter, discussed at various community meetings and shared widely through related means. The document was posted on ACHENA's public website and comments were sent to ACHENA and compiled by the ACHENA's Executive Director.

A total of 8 sets of comments were submitted during the S&C public comment period. Each commenter sent an email or letter to convey their comments. Some included a separate document explaining their comments and four of the commenters included submission of an edited version of the S&C document using the track changes feature of MS WORD.

Below is a chart outlining the major areas of comments submitted:

Topic	# of commenters	Level of consensus
Need to improve overall organization and clarity of the document	3	All comments similar in nature
Include information about the process for updating the S&C document and who participated	3	All comments similar in nature
Include sections to address the History of the Document, and Future Considerations as did the previous version. Clearly state the purpose of the document as guiding the education and competencies of professional practitioners of homeopathy.	3	All comments similar in nature
Focus solely on professional homeopaths, include more focus on the Certified Classical Homeopath (CCH) credential as standard for the profession and remove reference to other types of non-professional practitioners	4	All comments similar in nature
Remove the section on risk management	4	3 exclude; 1 offers specific edits
Focus on Classical Homeopathy, remove reference to contemporary theories	2	All comments similar in nature
Inclusion or removal of addressing social determinants of health and social justice issues	3	1 indicated support; 2 suggested removal
Current politico-legal environment should be updated	2	All comments similar in nature
Comments on the section of the preamble titled Updates in Health Care Provision, Education and Learning Technology: Content is presented as opinion, not standards or competencies; Do not support requiring schools to teach use of technology; Too many additional topics will make it impossible to address within the 1,000-hour program range	2	All comments similar in nature

Process for Deliberating on Public Comments

To review the comments received, a committee of people who were not involved in developing the revisions or submitting comments was recruited to serve as the final deliberators. See Attachment 2 for a list of the members of the S&C Public Comment Deliberation Committee. This committee included representatives from ACHENA, CHC, NASH, HNA, the Homeopathic Academy of Naturopathic Physicians (HANP), and the American Institute of Homeopathy (AIH). Outreach was conducted to the National Center for Homeopathy (NCH) and the Council of Homeopathy Schools and Colleges (CHSC) but due to the criteria for serving as a representative

or the nature of committee’s process, the committee was not able to include representatives from these two organizations.

All members of this committee signed on to specific ***Guidelines and Agreements for Participation on the S&C Document Review Committee*** to ensure they served as effective community stewards of this process. This document is included as Attachment 3 below.

The following chart outlines the major areas of comments and the actions taken upon these comments by the Deliberation committee:

Comment	Action Taken
Need to improve overall organization and clarity of the document	The review committee feels that presenting the document for public comment using the MS Word <i>Track Changes</i> function made it difficult for many reviewers to follow. The committee worked hard to improve the organization and clarity of the document. Repetitive content was streamlined. The document underwent a careful proof-reading to remove formatting problems, typos and other inconsistencies with margins, numbering and indenting. The document was reduced in length – the 2013 edition was 112 pages and the 2022 edition is 92 pages.
Include information about the process for updating the S&C document and who participated	The title of the initial section of the document was changed from Preamble to Introduction.
Include sections to address the history of the document, and Future Considerations as did the previous version. Clearly state the purpose of the document as guiding the education and competencies of professional practitioners of homeopathy.	A thorough description of the history of the document was added to the Introduction section, with a specific focus on steps that were taken to promote community participation in the current set of updates. Edits were made to clearly state the purpose of the document and a section on Future Considerations is included.
Focus solely on professional homeopaths, include more focus on the CCH credential as a standard for the profession and remove reference to other types of non-professional practitioners	The committee agrees that the S&C document should stay true to its purpose which is to outline the standards of education and competencies for the professional practitioner of homeopathy. The title of the document and language throughout was tightened to reflect this. The committee included language in the Introductory section to explain the current status of the professional practitioner of homeopathy as an emerging profession. The review committee felt that it is important to retain some information about levels of study and levels of practitioners to assist the

Comment	Action Taken
	<p>profession and the public in clearly distinguishing between well-trained individuals who are members in this emerging profession, advanced practitioners, and others.</p>
<p>Remove section on risk management</p>	<p>The committee fully discussed the merits and drawbacks of the new, proposed sections of the document on risk management. The committee acknowledges that the language added to the section formerly titled Preamble was not articulated in the form of concrete standards or competencies.</p> <p>The committee assessed that much of the intent of the section on risk management was to clarify important scope of practice issues in the context of limited general community awareness of our emerging profession and inability of the public to discern between well-trained professionals and others. A chart was added as Appendix 1, titled: Recognized Certification in Homeopathy Practice. The committee added language emphasizing the role and importance of the CHC code of ethics and other professional expectations that guide the work of the credentialed practitioner.</p> <p>A new section of education standards and practice competencies was added to address the role that some professional practitioners play in offering consumer education about homeopathy. This section, which begins on page 47, outlines important educational content about levels of education in the practice of homeopathy, and scope of practice issues. It provides important “guard rails” to guide professional practitioners who educate consumers about the home practice of homeopathy.</p> <p>The committee feels that the updated document takes an important step forwarding in addressing a key issue related to risks to our profession that those who prepared the updated document were trying to address, while at the same time, honoring the concerns of the commenters.</p>

Comment	Action Taken
Focus on Classical Homeopathy, remove reference to contemporary theories	The committee added language throughout the document to indicate its focus on Classical Homeopathy. The committee included language that acknowledges that schools may also choose to teach contemporary theories in accordance with the school’s philosophy, culture and educational objectives.
Inclusion or removal of social determinants of health and social justice issues	<p>The committee carefully considered conflicting comments recommending the inclusion or omission of reference to social determinants of health and social justice issues in the document. The committee acknowledges that the S&C document should not be presented as a partisan political statement but rather should seek to unify the homeopathy community around ensuring access to high quality, unprejudiced homeopathy education and services to all segments of the diverse North American population.</p> <p>The fact is that inequitable access to social determinants of health and persistent injustices experienced by certain communities have led to significant disparities in health outcomes across populations. The committee refined the language in the document to remove reference to social determinants of health and social justice from the Professional Development section of the document while more clearly defining the homeopathic rationale for addressing social determinants of health as elements of etiology, maintaining cause and obstacles to cure in the case taking, case analysis and case management sections of the document. The committee also more closely tied addressing social justice to the process of conducting unbiased case taking, case analysis and case management.</p> <p>Professional homeopaths are best equipped to develop thriving practices when they are able to engage in self-reflection needed to provide services that are truly in line with the CHC code of ethics which states practitioners should “Conduct the homeopathic practice with vigilance, integrity, and freedom from prejudice, and treat all clients with respect and dignity”. Providing non-judgmental, affirming services to assist individuals of all races, ethnicities, religions,</p>

Comment	Action Taken
	<p>sexual orientations, and genders in fully realizing their highest potential in life is in-line with the teachings of Hahnemann in the <u>Organon</u>.</p> <p>Just as statements issued by the American Medical Association, American Nurses Association and American Psychological Association have sought to address racism and health disparities, the committee assessed that for homeopathy to grow in North America, professional homeopaths should be aware of the impact of social issues on health and be prepared to provide affirming services to a diverse panel of clients. This is especially important given the evolving demographics of North America and the interest in holistic health across all populations.</p>
<p>Current politico-legal environment should be updated</p>	<p>The committee agrees that professional homeopaths and others should have access to up to date information about the political and legal forces that shape access to homeopathic remedies and practitioner scope of practice. Given that the S&C document is updated every 5-10 years the committee assesses that it would not be possible to ensure this section of the document remains up to date. In light of the fact that NASH has commissioned a thorough study and report on the political and legal environment of homeopathy throughout North America, the committee decided to remove this section from the document and refer readers to the NASH resource which will be posted on the NASH website at https://homeopathy.org/ as well as on the CHC website at https://www.homeopathicdirectory.com/</p>
<p>Comments on the section of the preamble titled Updates in Health Care Provision, Education and Learning Technology: Content is presented as opinion, not standards or competencies and in some cases too prescriptive; Do not support requiring schools to teach use of technology; Too many additional topics will make it impossible to cover all content within the 1,000-hour program range; should stick to</p>	<p>The committee removed text that was not articulated as standards or competencies from the preamble. Part IV: Delivery of Training starting on page 66 was added to define standards related to Distance Education. Schools are encouraged to periodically assess the distance education and telehealth landscape and adopt new technologies that would support the specific school’s philosophy, culture and community needs. Standards on technology are expressed in more narrow terms such that schools will be responsible for ensuring that all faculty and students are proficient</p>

Comment	Action Taken
core homeopathy content and address other topics as continuing education.	and comfortable with all aspects of distance learning and digital technologies used by the program. Given telehealth's role in expanding access to homeopathic care, standards have been added in various sections of the document regarding students having opportunities to observe experienced practitioners providing care via telehealth and having opportunities to gain experience with case taking and case management via telehealth. The committee believes that these revisions will enable schools to keep their programs within the 1,000-hour range.

S&C Steering Committee Members

ACHENA:

Alastair Gray, PhD, MSc, BA Hons, ADH, DSH, PCH, PCHom (chair)

Anna Vakil, PhD, CCH

NASH:

Jared Coggins, CCH, RSHom(NA)

Julie Mann, CCH, RSHom(NA)

CHC:

Randy Fruchter, CCH

Ann McKay, RN-BC, MA, HN-BC, CCH, HWNC-BC

Additional Community Leaders who Served on the Steering Committee

Shahram Ayoubzadeh, ND, HOM

Kathy Zimmerman, PhD, MSN, FNP-BC, APHN-BC

S&C Public Comment Deliberation Committee Members

ACHENA: Karen Allen, CCH

AIH: Lauren Fox, FNP, BC, CCH

CHC: Sheela Porter-Smith, CNM, CRNP, CCH

HANP: Mike Knapp, ND, DHANP

HNA: Sue Roe, DPA, MS, BSN, RN

NASH: Tanya Kell, CCH, RSHom(NA)

Note: ACHENA Executive Director, Rick Cotroneo, MA, CCH, was a non-voting member of the committee who assisted with meeting planning, facilitation and document editing.

Guidelines and Agreements for Participation on the S&C Final Deliberations Committee

The S&C document provides important guidance for the homeopathy community. Our goal is to prepare a document that our entire community can stand behind and that can help guide our national organizations in their work. The community is diverse and opinions are varied. The following guidelines are presented to committee members to help ensure our deliberations are productive, affirming and efficient.

1. I agree to participate fully, express my thoughts positively, and hold the process in high regard.
2. I agree to carefully consider all comments submitted.
3. I agree to listen to conflicting viewpoints and work toward finding common ground that respects the variety of opinions expressed.
4. Out of respect for the process, I agree to keep comments, committee discussions and deliberations confidential until release of the final document.
5. Out of respect for individuals - in my public discussion about the process after the final document is released, I agree not to identify any commenter by name, or committee member's votes or opinions by name.
6. Conflict of Interest Considerations:
 - a. Financial - if at any point during the deliberations I feel that my neutrality is compromised due to a personal financial interest relative to the matter under discussion, I will acknowledge the conflict and recuse myself from decision-making regarding the matter.
 - b. Personal - if at any point during the deliberations I feel that my neutrality could be compromised due to a personal relationship that impacts my feelings about the matter under discussion, I will acknowledge the conflict and recuse myself from decision-making regarding the matter.
7. I agree to work to review comments and conduct deliberations in a time-efficient manner, keeping focused on the issues at hand and using time wisely and productively.

Signed: