

**Updated and Adopted ACHENA Accreditation Standard 8:  
Summary of Public Comments and ACHENA Deliberations  
December, 2023**

## **Background**

ACHENA Accreditation Standards are community-accepted benchmarks that accredited schools follow to promote high quality education of professional practitioners of classical homeopathy. ACHENA's accreditation **Standard 8: Program of Study** guides schools in their didactic, clinical observation and clinical practice efforts to prepare students for professional practice and to earn board certification as a Certified Classical Homeopath (CCH) from the [Council for Homeopathic Certification](#) (CHC).

In October of 2022, key national organizations in the homeopathy community issued an updated document titled [Educational Standards and Practice Competencies for the Professional Practitioner of Homeopathy in North America](#) (S&C). This document outlines community-generated standards for the education of professional homeopaths and competencies for the professional practice of homeopathy in the US and Canada, with a specific focus on the Certified Classical Homeopath (CCH). It provides broad guidance to ACHENA for its school accreditation efforts and to the CHC for its practitioner certification efforts.

ACHENA engages in ongoing review of its [Accreditation Standards](#) through the work of a Standards Committee and is committed to ensuring that its accreditation standards remain aligned with the larger community's consensus outlined in the updated S&C document. As such, ACHENA engaged in a process to update **Standard 8: Program of Study** of its **Eligibility and Accreditation Manual**. ACHENA values input from accredited schools and engaged in a series of meetings between the Standards Committee and accredited school representatives to prepare an updated draft of **Standard 8: Program of Study** for broad community public comment.

A Public Comment Period to solicit comments on the updated draft of ACHENA accreditation **Standard 8: Program of Study** began on August 13<sup>th</sup> 2023 and was scheduled to conclude on October 13<sup>th</sup>, 2023. Information about the opportunity for public comment was made widely available on multiple occasions through ACHENA's mass email communications which include the following lists:

- Homeopathy General Interest: 468 contacts
- Continuing Professional Development providers: 33 contacts
- National Homeopathy Organizations: 6
- Accredited Schools/ Schools expressing interest in accreditation: 9

The Public Comment Period was also announced via the [National Center for Homeopathy's](#) electronic communications, during Homeopathy Action Alliance meetings, and other

community meetings. A community forum to solicit feedback from accredited schools was held on September 15<sup>th</sup> to review and discuss the proposed revisions and solicit input.

In the interest of allowing the community additional time to submit comments, the public comment period was extended from its initial ending date of October 13<sup>th</sup> until October 21<sup>st</sup>, 2023.

**Summary of Public Comments**

ACHENA received comments from four individuals and received extensive comments during the September 15<sup>th</sup> meeting with accredited schools. Overall, reviewers felt that the document was comprehensive and reflected the updates outlined in the 2022 [Educational Standards and Practice Competencies for the Professional Practitioner of Homeopathy in North America](#).

The table below summarizes specific substantive comments received and ACHENA’s response.

<b>Comment/ Line number from document posted for public comment</b>	<b>ACHENA Response</b>	<b>Specific Line Numbers in the Final, Adopted Standard 8: Program of Study</b>
<p>The updated standards should provide a more detailed explanation of how clinical training should be administered in accredited schools. (overarching comment)</p> <p>Emphasis should be on schools preparing students for independent practice upon graduation. (overarching comment)</p> <p>Consider aligning with CHC guidelines of a minimum of 10 cases with two follow-ups each to assure clinical experience is not solely observation. Line 1018 - 1025</p>	<p>ACHENA standards require schools to provide a comprehensive course of study that includes clinical observation and progressively independent clinical practice opportunities. Standards require that the course of study include significant opportunities for independent practice with supervision from a certified practitioner with at least 3 years of experience. Progression along the continuum of independent clinical practice opportunities is to be closely tied to, and dependent upon, the school’s student assessment practices and documentation of increasing competence.</p> <p>The updated standards state: “Under the supervision of a school faculty person or school-affiliated clinical supervisor, each student shall have</p>	<p>Clinical Training is outlined in the following areas of the standards            Lines 933 -1062            Lines 1154 - 1257            Lines 1377 - 1431</p>

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	<p>primary responsibility for managing a minimum of ten chronic cases, including responsibility for conducting the initial and a clinically appropriate number of follow-up appointments within the limits of the academic year and program. This shall include documenting case taking, completing repertorization, case analysis, remedy differential considerations, assessing clinical progress and fully preparing the case record”.</p> <p>The homeopathy community in the US has a history of calculating clinical hours as follows: 10 hours to work up the initial case, (including time for the interview and analysis), and two hours for each follow-up appointment. This calculation would then afford a student 140 hours of “clinical training” if they completed 10 independent cases, each with 2 follow-ups. ACHENA does not support the notion that a student should get 10 hours of “credit” for initial case-taking and 2 hours of “credit” for each follow-up session. The College of Homeopaths of Ontario does not afford students this many hours per case and its standards require more than 2 follow-ups. In current post-secondary training programs, the hours spent working-up an independent case would be deemed externship, practicum or homework, depending on a range of factors.</p> <p>ACHENA believes that schools should have the flexibility and creativity to</p>	

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	<p>deliver rigorous clinical training with the goal of preparing students for real-world practice. ACHENA understands the concern of the commenters that the program of study should prepare students for independent practice and that schools should be required to clearly define the number of hours spent in clinical observation and clinical practice.</p> <p>Accreditation practices, including self-study and peer review site visits, require schools to document that their clinical training is consistent with 500 hours of clinical training, including 250 hours of observation and 250 hours of practice. This includes clearly documenting clinical observation, clinical practice and independent supervised practice hours.</p> <p>ACHENA’s existing and updated standards and accreditation practices include tools to ensure that schools are truly offering 1,000-hour programs in a manner that is consistent with other post-secondary clinical training programs.</p>	
<p>Better define qualifications of faculty and clinical supervisors Line 403-407 Line 1001</p>	<p>Faculty Qualification are outlined under Standard 9- Faculty Qualifications. The text in Standard 8 was revised to include reference back to Standard 9 and outline the required qualifications which include holding a recognized certification and having at least three years of clinical experience.</p>	<p>Faculty and mentor qualification are described on: Lines 398 - 415 Lines 937 - 944</p>
<p>Better define what is intended by the term respected homeopathic</p>	<p>ACHENA revised the phrase to indicate – “respected, experienced classical homeopathic authors and teachers”.</p>	<p>Lines 559 - 560</p>

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teachers and authors – Line 554	Given the broad scope of past and current day teachers, schools are afforded the latitude to determine how they define this term in the context of their specific school culture, community and tradition within the overall field of classical homeopathy.	
Better define use of certain terms that appear subjective: perceptiveness – Line 594 adeptness – Line 609	The document was updated to more clearly define the desired learning outcomes in a manner that is objective.	Lines 607 - 625
Clarify the section addressing length of the program in full semesters, quarter semesters and hours Line 1152 - 1191	Language was revised to be more consistent and provide a more thorough explanation.	Line 1154 - 1191
Concern was expressed about the requirements to document the school’s CHC certification exam pass-rate when CHC is not willing to share this data with the schools – line 1437-1439	Conversations between ACHENA and CHC regarding this topic are on-going.	No change
Use of the phrase Pathology and Disease appears redundant Line 616 - 626	Based on professional experience and review of the larger academic environment, ACHENA changed the language from Pathology and Disease to Pathophysiology. CHC has been consulted on this change.	Lines 632 - 642
Concern was expressed about the capacity of distance education programs being able to meet certain clinical training guidelines - line 1378	Standard changed to remove in-person. It now reads “...live, direct observation” which is possible using synchronous distance learning technology.	Line 1402

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One commenter asked for an explanation of why schools are required to report on significant changes in student enrollment – line 1325	This is a requirement that the Education Department has established for accrediting agencies. The rationale for tracking growth is to ensure that a school or program does not grow in such a manner that it no longer has sufficient resources to adequately support the number of students. This has particularly been a concern of the Education Department because the move toward distance education has the potential to dramatically increase enrollment.	No change
Clarify bullets outlined under Personal and Professional Development Line 776-809	Text was revised to clarify items that appeared subjective	Lines 804 - 833

**Timeline for Implementation of Updated Standard 8**

Accredited schools should begin immediately to work toward reviewing their operations and aligning them with these updated standards. Full implementation of the updated standards is expected by September 1, 2025. All schools engaging in accreditation or reaccreditation self-study and peer review site visits after September 1, 2025 will be expected to meet the updated standards.