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Addendum to Petition for Renewal of Recognition

by the U.S. Department of Education of the

**COUNCIL ON NATUROPATHIC MEDICAL EDUCATION
and its
COMMISSION ON ACCREDITATION**

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Seattle, Washington 98155
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as the National Accrediting Agency
granting the statuses of
Accredited and Recognized Candidate for Accreditation

for

Colleges and Programs Providing
Professional Education for Naturopathic Physicians

Petition submitted June 12, 1989
Addendum submitted November 23, 1989

Addendum to Petition for Renewal of Recognition

November 23, 1989

The Council on Naturopathic Medical Education requests that the material below be considered an addendum to its Petition for Renewal of Recognition filed with the U.S. Department of Education on June 12, 1989. The material is relevant to a number of the Secretary's Criteria and its submission is stimulated by questions of the AAEB staff analyst, Joan Givens. There are also reports of some activities that have taken place since the submission of the Petition. The Criterion number is noted at the head of each section with indications of the issues that this new material is intended to address. Material already included in the Petition is not repeated here. This addendum is not intended as a complete response to any Criterion and must be read in conjunction with the text in the Petition.

Attachments to this addendum are numbered and follow the text. Attachment 1 is a reprint of page 39 of the Petition which was miscopied in the original submission. An additional copy of the 1989 edition of the Council's Educational Standards and Accreditation Procedures is enclosed with this packet.

602.14 National recognition ...by...

(a) [specifically naturopathic] educators and educational institutions

Among the educators who are presently members of the Council are two prominent naturopathic educators: Joseph Pizzorno, N.D. and Carlo Calabrese, N.D. Dr. Pizzorno has been the President of Bastyr College since 1978 and has also served on its faculty. He has been a trustee of National College. He is the co-editor and a principle contributor to A Textbook of Natural Medicine. Dr. Calabrese has been the Clinic Director and Dean of Clinical Education and a faculty member at National College. Three other members of the Council are former faculty members at naturopathic colleges. The CNME was incorporated in 1978 with three naturopathic educators on its original Board (Exhibit 3-9 of Petition for Renewal of Recognition). In the five full site visits done by the CNME since its revitalization in 1985, there have been ten site visitors (see Petition, pages 24 - 26). Of these, five were naturopathic physicians of whom four were at some previous point in their careers involved with naturopathic education, usually as faculty. Participation of naturopathic educators in the formation and operations of the Council is suggestive

of the broad acceptance of the Council's policies, methods and decisions.

The Council's Educational Standards and Accreditation Procedures (ESAP) and proposed changes to it are distributed to naturopathic colleges and organized student bodies. There have been no objections or suggestions for change to the ESAP from any naturopathic institutions with whom the Council has communicated.

Notice of the Council's activities at its reorganization were sent in 1986 to every institution that was reported to have a program in naturopathic medicine. These letters were included in the Petition for Initial Recognition submitted in February, 1987 (Exhibit 43). Letters was sent to 16 reported U.S. schools and nine foreign schools. Besides providing information on the CNME, the letters asked for information on other naturopathic programs of which the institutions might be aware. Many of these schools proved to be defunct; others, such as Bernadean University, are correspondence schools. The offer of institutional evaluation is made to every program of which Council members are made aware. The Council strives particularly to be aware of extant programs that may produce graduates eligible for licensure as naturopathic physicians according to any State law. We believe that, at the present time, there are only two institutions in the U.S. which do this or which meet the General Eligibility Standards in Section II A. of the ESAP (1989, copy enclosed). These two institutions thus presently constitute the universe of eligible institutions in the U.S. Both of these schools have applied for and hold status with the Council.

602.14 (b) Licensing bodies;...

At the time of submission of the Petition for Renewal of Recognition, the seats on the Council and its Commission on Accreditation reserved for naturopathic licensing board members were vacant due to the reorganization of the Federation of Naturopathic Medical Licensing Boards, Inc. which is the represented agency. The Federation is composed of representatives of the boards of the states and provinces where the profession is regulated. These seats have now been filled by the nominees of the Federation: Noel Peterson, N.D. of the Oregon Board of Naturopathic Examiners and Carl Phillips, N.D. of the British Columbia Board.

602.15 Resources.

(a) Financial

At the time of submission of the Petition for Renewal of Recognition in June, our financial records were undergoing audit by a certified public account. The audit has now been completed and has been forwarded to staff of the AAEB. A copy is presented as Attachment 4.

602.15 (b) Competent and knowledgeable personnel responsible for on-site evaluation, policy-making, and decisions...

The five site visit teams since the CNME reorganization in 1985 have been carefully constructed to assure that there are always experienced team members assigned for each visit. Their experience usually was gained in visits for the Northwest Association of Schools and Colleges (NASC) and they have helped guide the more inexperienced team members. Besides the written material on visitations in the ESAP (pages II-14 to II-18), the Executive Director has typically written additional materials for each visit (see Attachment 2) setting out background, tasks, and tentative schedules. We have also used the North Central Association of Colleges and Schools publication "A Manual for the Evaluation Visit." Briefings for the site visit for team members with the Executive Director are now scheduled before the visit (Attachment 2-9). Additional training for site visitors is being proposed by the Council's Standards Committee in the second part of its proposal on Validity and Reliability Reviews of Standards and Procedures to be submitted at the next meeting of the Council. Contacts have been made with the Northwest Association to allow some of our potential team members to participate in its workshop for site visitors before our next evaluation visit to an applicant school.

At present there is a limit of two terms of three years on the memberships of public members of the Commission on Accreditation. There is currently no limit on the number of terms that may be served by professional and institutional members of the Council. Given the short history of the Council and the spontaneous turnover among members, there appear to be no problems in this area at this time.

**602.16 Integrity of process.
(a)(1) Requires self-analysis...**

The guidelines for the self-study do not require any specific format to be followed as long as the material indicated is included. Since schools prepare self-studies for several agencies with parallel requirements, it was originally felt that this looser direction would allow the institution to do a more in depth study rather than expend resources in several different more superficial studies. Both schools which have written self-studies for the Council have chosen to follow the format of the Northwest Association of Schools and Colleges, with additional material where necessary to cover the needs of the self-study for the Council. Bastyr College provides an alternative lettering system relating to CNME standards. Site visitors, often experienced in visits for NASC, have generally been familiar with the Northwest format and where in it the information related to CNME standards would be found. It also seems to present few problems for the other Commissioners.

However, a proposal in preparation on the Reliability of Standards and Procedures calls for a closer correspondence between the standards as published in the ESAP and the self study as well as a closer correspondence between the format of the self-study guidelines and the standards of Sections II.A. and III. of the ESAP. This would have the effect of forcing naturopathic schools to follow the lead of the naturopathic accrediting agency if they wished to avoid writing multiple self-studies. This is probably appropriate given the nature of professional education and the desired outcomes. Guidelines have become firmer already in this edition of the

ESAP (page II-8), indicating the required rather than suggested nature of much of the material listed.

602.16 (a)(2) ...provides a written report...

The site visit report format is necessarily somewhat flexible as its guidelines indicate that it should avoid routine detail and instead describe the institution in a manner which differentiates it from similar institutions. Usually, the site visit report follows the order of the items of Section III. of the ESAP: "Educational Standards." (See Petition, Exhibit 20-3 to 20-9 and Exhibit 21-4 to 21-10.) In all cases, each item of Section III. is covered, though not necessarily in that order. As one example of variation, emphasis is given to "Finances" under a separate heading in the April 1989 site visit report for National College (Petition, Exhibit 21-14), though it would usually be considered under "Administration" (item C. of Section III.), because financial management has been a continuing area of concern with the institution.

602.16 (a)(2)(i) ...branch [and] off-campus locations...

The development of an off-campus location would be considered a substantive change as specifically indicated in the ESAP (page II-26, para. 2). An institution considering a substantive change is urged to contact the Commission early in its deliberations. If the change is major, a prospectus is to be submitted before the next meeting of the Commission. The contents of the prospectus and the course of possible Commission actions is described in the sections on Prospectus and Commission Actions of Section II. K. (page II-27). If the institution implements a substantive change without prior written notice or if it implements a change that the Commission has not approved, the Commission will consider issuance of an order for the institution to show cause why its status should not be discontinued. The Commission expects to conduct an on-site evaluation within a year following approval of a change.

602.16 (c) ...provides advance public notice of proposed new or revised criteria...

The Circulation List presented at Exhibit 24 of the Petition are the agencies and institutions that were informed in 1986 of the Council's activities at its reorganization, offered the Council's ESAP and evaluation, and whose input was solicited in CNME development. The list at Exhibit 54 are those interested parties, whether self- or CNME-identified, to which were sent the proposal for changes to the ESAP during its last cyclic review in 1989.

602.16 (i) ...reliability of criteria...

Reports of other agencies are made available to site visitors. Thus Commission members who have been at site visits and the Council members who are institutional representatives are familiar with the issues that have been raised for each of the institutions. Agency reports often indicate similar areas of concern. The prime example is the denial by both the Northwest Association of Schools and Colleges and the CNME of Candidacy of NCNM at reviews in 1983 and 1986 respectively for financial instability. The Oregon's Office of Educational Policy and Planning and the Washington Department of Licensing cite the same concern while acknowledging improvement and giving approval as did the CNME at a later review when evidence of compliance had increased. A detailed comparison of reports from different agencies during the past three years at the two schools the Commission has evaluated is presently being done as a preliminary step to the development of a comprehensive plan for effective review of the reliability of CNME standards and procedures.

602.16 (j) ...maintains complete and accurate records...

Since 1985, the Council has kept all documentation submitted to the Commission by institutions in connection with evaluations, all documents submitted by site visits teams including drafts of reports, and all correspondence related to evaluations including site visit reports and reports of actions of the Commission. This has been easy to do in terms of storage space since there have been only five full visits and one focused visit in that time. These records cover three visits at National College and two full visits and one focused visit at Bastyr. In the future, we are likely to continue to maintain many more records than the minimum requirements of the Criterion.

602.17 (b) ...satisfaction of certificate and degree requirements by all students,...is reasonably documented...

To determine that satisfaction of degree requirements is documented, a sample of student records is examined and compared to requirements by the site visit members assigned to "Administration" and "Scholastic Regulations." Discussions on this issue with the Registrar, Academic Dean students, faculty, and clinical supervisors also take place.

602.17 (c) Determine that institutions or programs document the educational achievements of their students,...

The Council considers that the requirements of the accreditation process set standards inherent in the process itself. For example, it considers that "the ability of the institution to make a critical self-study of its total activity and to write a scholarly report of its study are indications of institutional and program quality (ESAP, page II-6)." Thus, requirements of the self-study in the area of

documentation of educational achievement such as the data indicated under "1. History and Mission. d. Documentation of the level of achievement of the institutional mission and educational effectiveness in quantifiable terms, such as the number of graduates, performance on licensing exams, number licensed, number in practice or professionally related occupations, etc....3. a. Data on student attrition...3.b. Results of standardized tests and other measures of student achievement (ESAP, pages II-8 and II-9)" constitute a standard that must be met for the institution to achieve status with the Commission. This information must be provided no less than every five years as that is the longest period of accreditation now provided for.

The self-study requirements in this area are clear though not fully tested. The Council has collected data of this type from the colleges holding status with it (e.g., Petition, Exhibit 57), but they were not under a mandate to provide it. The Council is actively engaged in the development of still more useful standards based on educational outcome (Attachment 3). The orientation of many accrediting agencies is to develop standards measuring educational effectiveness based on the mission of the institution. As a specialized professional agency, the CNME activities are likely to go beyond this and set more specific outcome characteristics for naturopathic physicians' education. This must be carefully done and in close conjunction with other professional organizations and institutions. In the evolution of consensus in this area, the requirements for this data will help to indicate when those characteristics have been appropriately specified.

602.17 (e) Determining the extent to which institutions ... publicize ...objectives, ... assessment measures ..., [and] information obtained through those measures....

Besides the recent amendment to the ESAP covering this area with great specificity, the Council's standards have indicated the need for a first week orientation for new students. Both colleges hold these sessions before the start of classes and they are accessible to prospective students.

Student orientation shall include a discussion of the institution's objectives, organization and procedures, including scholastic regulations, student conduct, requirements for successful completion of class work, promotion, and graduation.

Emphasis should be given to defining the student's position in relation to the naturopathic profession. She/he shall be given an explanation of the legal, economic, and social place of the profession in society. Information should be provided about state regulations of the profession and the role of examining boards, both as a protection for the public and for the practitioners licensed to practice. (page III-9)

Students may withdraw with no tuition penalty at this time. Site visitors have examined the preparations and outlines for these orientations (e.g., Petition, Exhibit 21-4). Grouped results of licensing board exams are posted in the hallways of both institutions. Information from surveys of alumni are available from each of the institutions.

602.17 (f) Determining the extent to which institutions...apply the information obtained...to foster enhanced student achievement...

Besides the addition in this year's edition of the ESAP that the institution describe to the Commission "processes by which the results of measures of educational effectiveness are systematically applied to foster enhanced student achievement (page II-9)," the Council has called for clear institutional objectives since its founding (ESAP, item 4., page II-3, and page III-3). From its outset, the Council has indicated that the obligations of the Board include the development of "objectives and policies...to ensure effectiveness in serving students, the profession, and society (page III-4)." Administrative officers are to conform to "accepted standards for institutions of higher education" including an officer for academic affairs." Student records are to be used as appropriate to "the legitimate needs of the institution (page III-6)." The faculty should be involved in the evaluation and establishment of teaching methods and facilities (page III-13). The ESAP in its description of the self-study process, indicates that it is to "start with institutional objectives and penetrate every facet of policy, program, procedure, and personnel in terms of those objectives. Its scope must be quantitative and qualitative...(page II-6)." "A primary purpose of the self-study is to encourage institutions to devise their own plans for self-appraisal and improvement (page II-7)." The college's goals are shaped by the required demonstration "that its purposes are appropriate to naturopathic education (page II-3)" and "should address the preparation of the naturopathic physician to provide patient care (page III-3)." In the Council's earlier publication of standards, it expected "provisions for keeping current and accurate records of [alumni] names, addresses, licensure status, occupations and accomplishments (page II-10)" in order to provide feedback on educational outcomes. Given these necessary structures and orientation, evaluators have long held the opinion that it is fundamental to an institution of higher education, especially in preparation for a health service profession, that the administration and faculty use feedback that comes to them in ways to enhance the program and its outcomes.

In regard to specific measures, each of the colleges reviewed has done surveys of alumni for practice character, income, perceived weaknesses in their education, etc. The surveys were done primarily for the purpose of curriculum development. Since these are health care schools operating teaching clinics, surveys of patient satisfaction and quality of care have also been done. The observation of alterations of practice as a result of the findings of this type of survey are a prime source of enhanced student achievement that has a direct influence on their professional lives. The results of all surveys are available to site visitors on each visit. Licensing exam results are a sensitive issue for students and faculty and a dip in the passing rate in any subject has been vigorously responded to at both institutions. For example, when a lower passing rate in Psychology became evident due to inadequate attention at the colleges to DSM-III diagnostic categories, the schools increased time in this area. Both self-studies are replete with curriculum development issues related to educational outcome (e.g., Petition, Exhibit 22, pages V-23, V-25, V-27; Exhibit 23, pages 5-18, 5-25, 5-26, 5-28, 5-30).

- 602.18 Regard for adequate and accurate public disclosure...as to--**
(b) The institution's...educational effectiveness
(c) Employment of recent alumni related to the education offered
(d) Data supporting any quantitative claims made....

Along with the response to this Criterion in the Petition, material in the response to Criterion 602.17(e) in the Petition and the new material this addendum is relevant to this Criterion.

Before the adoption of an amendment to the ESAP responding precisely to this Criterion, CNME standards required and continue to require that institutions must state their objectives in a catalog along with curriculum content, clinical training, entrance requirements, promotion and graduation requirements, and a description of facilities (ESAP, page III-7). Accurate disclosure of accreditation status is required (page II-32). Faculty lists with degrees and schools are included in both catalogs.

Curricula of member institutions must satisfy state laws for licensure. Licensing exam results at both schools are posted in the hallways. Availability of career counseling at both schools is noted in the catalog and potential students may avail themselves of it. National's catalog strongly recommends a visit to the campus where students could access much information on employment (Petition, Exhibit 23, page 12). Bastyr College's catalog contains the licensing possibilities in states and provinces. Results of surveys of alumni with much information on post-educational careers are provided on request by the admissions departments and are available in the school's libraries.

- 602.19 Regard for decisions of states and other accrediting agencies**
(b) ... taking into account actions by other recognized agencies which have denied ... status.... have placed on public probationary status, or have revoked the ... status of the institution....

The Council views the activities of other recognized agencies as important to its evaluation of applicant institutions. In the case of initial evaluation, if there has been a previous denial, probation, or revocation, the Commission and site team would consider whether the reasons for the action fall within one or more of the standards of the Council on Naturopathic Medical Education. If so, there is reason to expect that the Commission would reach a similar finding. For example, the Northwest Association of Schools and Colleges in 1983 denied Candidate status to National College of Naturopathic Medicine on the basis of financial instability. At its evaluation of National College in 1986, the Council's Commission also denied Candidacy on the basis of financial condition and did not grant Candidacy until the institution had substantially reduced its debt and balanced its budget in successive years.

Attachment List

1. Reprint of page 39 of Petition for Renewal of Recognition .
2. Written instructions from Executive Director to site visit teams
3. Validity and Reliability Review for the Standards and Procedures of the CNME,
Part I., Validity of Standards
4. Audit for 1988

the institution (Exhibit 11, page II-18), whether positive or negative. Precisely how the general objective of producing a competent naturopathic physician is reached is, of course, in continuous development as is indicated in the discussion of the validity of standards.

602.17

(b) Verifying that satisfaction of certificate and degree requirements by all students, including students admitted on the basis of ability to benefit, is reasonably documented, and conforms with commonly accepted standards for the particular certificates and degrees involved, and that institutions or programs confer degrees only on those students who have demonstrated education achievement as assessed and documented through appropriate measures;

The ESAP states that "The candidate for graduation must have completed the prescribed curriculum of the college, complied with all its regulations, and demonstrated educational achievement appropriate to patient care as assessed and documented through verifiable and consistently applied academic and clinical measures before a degree is granted (Exhibit 11, page III-10 and Exhibit 17L-9)."

The site visit worksheet serves to remind team members to check that satisfaction of requirements is documented (Exhibit 55-3 [Record keeping], -4 [Graduation requirements], -6 [item I. records and documents]).

The central educational objective of training competent physicians and its related scholastic achievements is addressed in site visit reports (e.g., Exhibit 20-5 [para. D.], -6 ["Assessment"], -7 [under "Clinical Staff"], -22 and -23, 21-4 ["Admissions"], -6 ["Grading, Promotion and Graduation"], -7 [Clinic Evaluation System], -14, -20, -21 [5) Student records], etc.). Since there are only two schools holding status that have each had more than one visit and since the Procedures call for the return of one visitor who has been on a previous visit (Exhibit 11, page II-6), once the adequacy of various systems are established, visitors at repeat visits tend to focus on areas that have changed significantly while keeping an eye out for possible deterioration.

602.17

(c) Determining that institutions or programs document the educational achievements of their students, including students admitted on the basis of ability to benefit, in verifiable and consistent ways, such as evaluation of senior theses, reviews of

March 22, 1986

INFORMATION MEMORANDUM

TO: Members, On-Site Evaluation Team for the Accreditation Commission, Council
on Naturopathic Medical Education (CNME)
President, CNME
Secretary-Treasurer, CNME
Chairman and Members, Accrediting Commission

FROM: James W. Moore, Executive Director, CNME

Introduction

For the benefit of all of the people involved in the current effort of CNME to (1) accredit the universe of eligible naturopathic medical education institutions and (2) secure national recognition of the Council by the U. S. Department of Education, it seems to me high time to review in some detail the origins of this process, progress to date, and the tasks immediately ahead. Therefore, I have incorporated as much pertinent detail as possible, in order that each of you may have a full understanding of what I am doing, what the Council and Accrediting Commission are engaged in, and, more specifically, what each of you has as a share of the overall responsibility. If this looks to be too lengthy, skip the boring parts.

I am serving for 1986 as the Executive Director of CNME. My own background has been principally in government service, first as the initial director of the California State Scholarship program in the late '50s, and then as a senior manager in the Federal student financial assistance programs from 1960 to 1984.

During the long developmental period of the Federal activity we were vitally concerned with institutional accreditation, eligibility and related matters, especially because of the very large increase in sheer numbers of post-secondary institutions during the '60s and '70s. When I went to Washington in 1960, there were six regional accrediting associations and perhaps two dozen specialized agencies: law, medicine, business administration, dentistry, and so forth. Today, there are still six regional groups and more than 70 specialized agencies. This latter group is still growing.

I. Background and Task Definition

The absolute universe of naturopathic medical education institutions consists of two schools, namely John Bastyr College in Seattle and the National College of Naturopathic Medicine in Portland. There is a third institution in Toronto, Canada, with which the Council may be concerned at a later date. The Canadian school, however, is not a part of the current accreditation effort.

As of this writing, the John Bastyr College does hold Candidate for Accreditation status with the Northwest Association of Schools and Colleges. The College, however, has been put on formal notice that the Northwest Association

intends to withdraw such status because of a policy adoption by Northwest in 1983 which precludes accreditation of free-standing single-purpose institutions. This policy change was interposed at the time the National College sought Candidate status from Northwest, thus terminating any possibility of favorable action by this regional accrediting association. Without access to Northwest, and without access to any of the many specialized accrediting agencies now in existence, it is obvious that only the creation of a new naturopathic medical education system, formally recognized by the Department of Education, will meet the present and future needs of institutions in this category.

Thus, there are two major tasks to be accomplished in the immediate future. First, eligible institutions must be accredited according to published standards and procedures. Secondly, on the basis of actual accreditation, a petition for national recognition by the U. S. Department of Education of CNME and its Accreditation Commission as the single specialized accrediting agency for naturopathic medical education must be submitted for action later this year.

It is important to note that these two tasks, while related, are in reality quite different. The CNME has sole responsibility for the development of standards and procedures which are to be used in assessing the quality and character of the educational programs offered by institutions which now and in the future apply for accreditation. In contrast, the role of the Federal government is limited to judgment as to the reliability and validity of the methods and procedures employed by the accrediting association. The Department of Education has no jurisdiction over curriculum content, quality of an educational program, or similar elements within the structure of an educational institution.

An historical note may be of assistance in further understanding the difference between the association's, or accrediting agency's, role and the responsibility of the Federal government. When the Serviceman's Readjustment Act of 1944 (the WW II GI Bill) was enacted, the statute provided for state determination of postsecondary institutions eligible to enroll and educate returning veterans. Over the next six years, state discharge of this responsibility proved to be uneven--to the point of near unreliability in some jurisdictions. Many of the so-called GI Bill scandals of the late forties can be traced, in part at least, to extremely poor state activity in establishing institutional eligibility.

In 1951, as the Congress again addressed the matter of institutional eligibility as part of the Korean conflict GI Bill, Olin Teague of Mississippi, who was Chairman of the House Veteran's Affairs Committee, directed his staff to find a more effective and reliable system than that grounded in the WW II GI Bill state approval authority. The Congress did not want the Federal government involved in direct accreditation of institutions. Accordingly, Teague's staff proposed to him that the law should direct the only chief education person in the government--The Commissioner heading the old U. S. Office of Education--to publish each year a list of the accrediting agencies or associations that the Commissioner deemed to be reliable. This statute is still in force and is the basis for the national recognition authority held by today's Secretary of Education. Thus, while actual accreditation is

a local matter, it has no real force until formal recognition by the U. S. Department of Education.

As will be shown below, the critical date, toward which all of our activity this past Winter and this Spring is directed, is the November 1986 meeting of the National Advisory Committee. The critical recommendation for national recognition of applicant associations will emerge from the agenda of this meeting.

II. Calendar of Critical Events

In order to be assured of full consideration at the November meeting of the National Advisory Committee on Accreditation Agencies, an applicant organization must have its petition together with supporting documents in the hands of the Department of Education Agency evaluation staff six months prior to the established meeting date, or about May 1. This submission date is the key element in our operating calendar. The list of critical events is shown below.

- Dec. 8, 1985: Most recent meeting of CNME and Accrediting Commission. CNME (incorporated in June 1979) by-laws to be updated for next meeting. Work begun on revising Educational Standards.
- January 1986: Executive Director appointed.
- February 1986: Standards and Accrediting Procedures document circulated, reviewed and printed.
- March 3, 1986: Applicant institutions completed and submitted self-studies.
- April 1-3, 1986: Applicant institution site evaluations take place.
- April 19, 1986: CNME and Accrediting Commission meet to consider and act upon institutional applications for accreditation status.
- May 1, 1986: Petition submitted to U. S. Department of Education.

All of the events and required activities through March 3 have been completed on time. Because the applicant group of institutions is small (2), and because of geographic proximity, it is possible to condense a large number of necessary activities and required events into a fairly short span of time.

CNME's president has received the resignation of the Chairman of the Accreditation Commission, but only as Chairman. During the interim until a new Chairman is appointed, the Executive Director must assume a number of the functions which ordinarily would be carried on by the Chairman.

III. Organization of Site Evaluation Team

Since this is the very first full-fledged accreditation program to be undertaken by the CNME, it was determined early on that the best and most effective evaluation team would be one composed of veteran evaluation personnel and professionals in naturopathy. To this end, the persons listed below have agreed to serve on a joint team. The term "joint" simply means that some persons will participate in the evaluation of both applicant schools. The overriding consideration has been a concern for the crowded calendars and practices of the team members themselves.

The members are: Dr. Russell J. DeRemer, Dean of Students, Whitman College, Walla Walla, Washington;

Mr. R. Ferris Kirkham, President Emeritus, LDS Business College, Salt Lake City, Utah;

Robin Moore, N. D., Olympia, Washington;

Bruce L. Canvasser, N. D., Portland, Oregon.

Dr. DeRemer and Mr. Kirkham each have had considerable experience in the evaluation programs carried on by the Northwest Association of Schools and Colleges. Actually, Dr. DeRemer participated in the NCNM site review done by the Northwest Association two years ago. Drs. Moore and Canvasser are practising NDs and, respectively, are graduates of JCB and NCNM.

The team for the JCB review is made up of Dr. DeRemer, Mr. Kirkham and Dr. Canvasser. The team for the NCNM review is Dr. DeRemer, Mr. Kirkham and Dr. Moore. The JCB review opens at 9 a.m. on Tuesday, April 1 and closes before noon on the next day. Dr. Canvasser will be at the site only for a full day on Wednesday. The NCNM review begins at 2 p.m. on Wednesday, April 2 and concludes on Thursday, April 3 in the afternoon. Dr. Moore will be at the site only for a full day on Wednesday.

IV. Evaluation Team Member Assignments

We have sorted out the several educational standards items which make up Part III of the CNME Standards document and have assigned a particular set to each of the three team members scheduled for each review. In this way, we have to use each member's specific talent and expertise in the most effective manner.

Dr. DeRemer will assess activities and procedures covered under:

- D. Scholastic Regulations
- E. Curriculum (Items a and b under Core Curriculum)
- F. Faculty
- G. Library
- H. Research (shared with Moore and Canvasser)

Mr. Kirkham will review activities under:

- A. Mission and Objectives
- B. Organization
- C. Administration (with special emphasis on Financial Management)
- I. Physical Facilities

Drs. Moore and Canvasser will be responsible for:

- A. Mission and Objectives
- E. Curriculum (Clinical Sciences and Clinic Experience)
- H. Research
- J. Continuing Education.

V. Reporting

The first step toward the production of the required report consists of entry and exit conferences. These have been scheduled with the CEO at each institution to be visited. Following the visit, each team member will promptly submit a report to the Executive Director covering his or her particular area of review. The Executive Director will be responsible for coalescing these documents into a final report and for carrying out the procedures specified in Section G under Part II of the CNME Standards. Just as soon as a new Chairman of the Accrediting Commission is appointed, the appropriate functions will immediately be transferred to him or her.

The final step in the process of institutional accreditation occurs at the April 19 meeting of the CNME and the Accrediting Commission.

VI. Submission of Petition to the U. S. Department of Education

During April, the Executive Director together with the officers of CNME and the Commission will prepare the necessary petition to the Department in order to secure national recognition of CNME and the Commission as the national agency for accrediting institutions of naturopathic medical education. We anticipate that the Department's Advisory Committee on Agency Evaluation will take up this matter at its next meeting in November 1986. The Departmental staff units which review petitions and make recommendations to the Advisory Committee already have been alerted to the CNME intention to file a petition, in order that the preliminary staff review may be expedited.

March 28, 1986

Briefing Memo:

To: Members, CNME Site Evaluation Team

From: James W. Moore, Executive Director, CNME

Following are some notes and suggestions which may be helpful to you in your conduct of the site evaluations during April 1 through 4, 1986.

1. Remember that neither of these colleges is entering this accreditation de novo. Bastyr has held candidate status with the Northwest Association since 1983. The National College completed a self-study and a Northwest site evaluation in 1983-84, before the policy shift in the Northwest Association.
2. Keep the CNME functions and the U.S. Department of Education functions completely separate in your thinking. The matters of standards, quality of program, adherence to standards and actual accreditation is totally a function of the Council on Naturopathic Medical Education. The Federal role is limited to an assessment of process and procedure and system.
3. Your task is to validate information in portions of the institutional self-study as it relates to a specific educational standard prescribed by CNME.
4. Since time is extremely short, it will be necessary to use sampling techniques and a sort of rapid survey, when visiting classes, talking to faculty members or students and the like.
5. Also, reasonable estimates are in order. For example, if the institution claims library holdings of 10,000 volumes - a quick walkthrough and a fast calculation should be enough to validate this statement. Similarly, if there are records in the clinic which show an average visit by outpatients at 100 per day, a survey of numbers of examination rooms, staff size, etc. should quickly tell an experienced practitioner whether the 100 per day figure is real or imagined.
6. Finally, for those of you who have had little experience in this sort of evaluation activity, remember that the entire staff and student population of each of these schools is primed to provide you with all of the assistance, answers, facts, demonstrations - in short, with whatever you need, when you need it.

Council on Naturopathic Medical Education

Commission on Accreditation

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503-255-4860

September 25, 1983

Memorandum:

To : Dr. Shelley
Dr. Broadwell
Mr. Pahre

From : James W. Moore, Executive Director, CNME

Subject : Site Review, National College of Naturopathic Medicine

Enclosed you will find the following items:

- 1) A copy of the NCNM Self-Study dated September, 1986
- 2) Copy of the institutional transmittal letter
- 3) Copy of the CNME Educational Standards and Accreditation Procedures
- 4) Copy of the NCNM 1985 - 1987 Catalogue.

Note: Copies of the student handbook and faculty handbook are being sent under separate cover.

Schedule:

Team Briefing on Sunday evening, October 5, 1986. I will call each of you with detailed information on this activity.

Site Review at NCNM to begin with opening interview with President Nealey at

Review activities will continue throughout Monday, October 6, Tuesday, October 7 and conclude on Wednesday, October 8 with a close-out interview with the president and his senior staff.

Area of Responsibility for each Team Member.

I suggest the following division of review activities among the team members. Refer to Section III of the Educational Standards Manual, noting its division into ten subsections under alpha designations. Team members are free, in fact, encouraged to shift these assignments around during the October 5 briefing session, if changes are deemed appropriate.

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1986

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Dr. Shelley (Team Leader)

- A. Mission and Objectives
- F. Faculty
- G. Library Services

Mr. Pahre

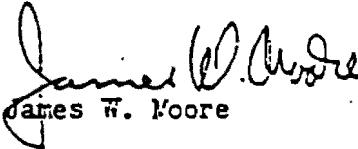
- B. Organization
- C. Administration
- D. Scholastic Regulations
- I. Physical Facilities

Dr. Broadwell

- E. Curriculum - including Clinical Experience
- H. Research
- J. Continuing Education

As some of you may already know, the application from WCNM is the second to be filed with the Accrediting Commission this year. The March application, which was rejected by the Commission, together with site reports and other pertinent documents will be available to you beginning with our Sunday evening briefing session.

I would like to hold the briefing session on October 5 here at my home in Lake Oswego from 6 pm until 8:30 or so. I will be in touch with each of you as to specific instructions. We are on the west side of town, not too far from Hillsboro, and just up Route 43 from Oregon City. I am looking forward to the first meeting of the team on October 5.


James W. Moore

cc: Reading File
Chair A/C

Note: The foregoing information is being transmitted to you at the direction of the Chairman of the Accrediting Commission.

JWM

Council on Naturopathic Medical Education

Commission on Accreditation

March 1, 1987

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C. Calabrese, N.D., Vice President

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503-636-8655

MEMORANDUM:

TO: Site Evaluation Team for John Bastyr College - March 2, 1987

FROM: James W. Moore, Executive Director, CNME 

SUBJECT: Briefing Memorandum.

1. Structure of site visit.

As I have informed the institution, this is a recapitulation of the evaluation done by this same team at the end of March, 1986. It is grounded in the list of suggestions and recommendations which the 1986 team sent to the Accrediting Commission.

I talked with Sheila at JEC on Wednesday, concerning the agenda for Monday, and we agreed that the institutional staff would organize the interviewing plan for the day, to make certain that key people would be present at specific times.

2. Areas of emphasis for actual evaluation activity.

Each team member is responsible for the same activities as those he covered last year. The key documents are the April, 1986 reports and the February 24, 1987 institutional update.

3. Findings.

Since this institutional application is for full accreditation by the Commission, the team report must stipulate that the institution does (or does not) meet all of the general standards in Section II and the standards for Colleges of Naturopathic Medicine in Section III

The first Department of Education review of our first petition takes us to task (on the John Bastyr College evaluation in 1986) for co-mingling recommendations with judgments on compliance standards. We will use the new evaluation review to rectify any errors in the 1986 document.

Also, we have underway an extensive re-drafting of proposals for modifying the CNME Educational Standards document to clear up this should/must problem. These changes will be worked over by CNME during this year, preparatory to final consideration at the Fall 1987 meeting of the Council.

4. Schedule.

Sunday, March 1	7 PM	Briefing
Monday, March 2	9 AM	Open Review
	3:30	Closeout session with CEO
	4:00	Adjourn

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Council on Naturopathic Medical Education

VALIDITY AND RELIABILITY REVIEWS FOR THE STANDARDS AND PROCEDURES OF THE COUNCIL ON NATUROPATHIC MEDICAL EDUCATION

Part I. Validity of Standards

Carlo Calabrese, N.D., President, Konrad Kail, N.D., and Robin Moore, N.D.

November 4, 1989

The purpose of the present document is to propose a cyclical program for the systematic review of the validity of the standards by which the Council on Naturopathic Medical Education and its Commission on Accreditation evaluates schools and colleges granting the N.D. (or N.M.D.) degree.

The Council's Liaison Committee, which works with other naturopathic professional agencies, was given the direction at the meeting of May 20, 1989 to outline a definitive approach to the validity issue. With the understanding that validity and reliability are linked, our emphasis in this document is on validity. Part II. of the reviews proposal focusing on reliability will be presented at the next meeting.

The Mandate for Validity Review

Validity and reliability reviews are a principle assurance of the value of the accreditation process to the institutions which voluntarily enter the process, their students, and the public. The U.S. Department of Education's Criterion 602.16(i) for the recognition of accrediting agencies requires that the Council

...maintains a systematic program of review designed to assess the validity and reliability of its criteria, procedures, and standards relating to its accrediting and preaccrediting activity and their relevance to the educational and training needs of affected students.

Accordingly, a 1987 amendment of the Council's By-laws states in Article I, Section 2:

Standards of the Council are to be valid in that an independent observer of an accredited institution may infer high quality in the institution or program by virtue of its compliance with the standards. They are to be applied consistently and with minimal error.... Standards and procedures shall be regularly and systematically reviewed by the Council or a committee appointed by it so as to ascertain their continuing validity and reliability.

Continuing validity and reliability is stressed so that accreditation standards may keep up with -- and sometimes lead -- evolving profession needs. A cycle of activities for regular review is presented below. Department of Education reviews of the Council have provided for overhauls of standards on a yearly basis since 1986, but the Council cannot continue to rely on this mechanism. Though the Department reviews have been salutary, the process must become more finely attuned to the specific needs of the naturopathic physician in training. Hopefully, the Council will, at the present Department review, receive a multi-year recognition so that the energies that have been invested there each year can be redirected to the other efforts of Council development. The Council and its Commission on Accreditation have achieved much in terms of organization and the fulfillment of its basic mission. In the opinion of this Committee, improving the validity of its standards and the reliability of its evaluative process is the task where its best contribution can now be made to the development of the naturopathic profession and the welfare of the public.

Outcomes Assessment and Validity

One definition of "validity" is contained in the By-laws statement above. A more general definition simply says that the validity of a standard implies that it measures what it is intended to measure. "Reliability" in standards and procedures means that they would yield the same result on repeated application. For example, a repeated evaluation of an institution in the same time frame with a different team would lead to a similar accreditation decision. Once it is determined that standards are valid, their consistent application increases reliability. Thus the reliability review will focus more on procedural and decision-making aspects of the accreditation process.

The question with respect to validity becomes: what do we intend to measure? What do we mean by "high quality in the institution or program" as stated in the By-laws? Given the present direction in education toward emphasizing the outcomes of the educational process in the determination of quality, what are the outcomes to be assessed for accomplishment? What will the measures of outcomes achievement be? Will meeting the standards lead to the desired outcome? Thus, identifying the desired outcome is fundamental to a validity review.

Present Activities Related to Validity Review

The original responsibility of the Liaison Committee was to help ensure adequate communication among the CNME, the colleges, licensing boards, and the Naturopathic Physicians Licensing Examination Board (NPLEX). The object was to encourage parallelism among standards of different agencies. -Increased communication and consequent agreement on practice and educational guidelines have an indirect influence on the validity of CNME standards as they are developed.

The schools recently gave feedback to the Committee that they wanted summaries from NPLEX on outcomes of testing for graduates. CNME has received copies of the summary sheets. A pattern of weakness in two areas was identified which the schools have been responding to. Review of the results of licensing exams is incorporated into the proposal below. The Committee has also been soliciting information from licensing boards and has collected other documents which will be useful in validity review.

The Committee proposes that the plan below be discussed among the Council members and with educational, regulatory, and professional agencies between this and the next regular CNME meeting in approximately six months when we will move that it be adopted as Council policy and procedure. Keep in mind that the history of validity reviews of this nature is short and scant. The Committee will continue to scan the educational literature and the activities of other health care providers' accrediting agencies for effective programmatic approaches to this issue and may itself recommend adjustment before a final plan is adopted at the next meeting.

PROPOSED REVIEW PROCESS

Organization of the Review Process

A standing Committee on Standards should be evolved separate from the present Liaison Committee. It should be composed of at least three members including a college representative, a licensing board representative, and a public member, and including among their number at least two naturopathic physicians, at least one of whom is in active practice. They are to be encouraged to call on CNME members and other health care professionals and educators to assist them in their work. They should have the ability to contract with outside experts for additional assistance within a budget to be determined by the Council. The possibility of a one time assessment of a contribution from institutional members for this task may be considered. Their efforts may be linked to curriculum and institutional development initiatives at member and non-member naturopathic colleges internationally and with education committees of
2 no national associations

A yearly cycle for standards reviews was officially established at the meeting of 5/8/88. A review of sufficient depth, given the present maturity of standards and begun now, will take an estimated three years in order to collect and analyze the data, formulate and present recommendations for amendments of the Educational Standards and Accreditation Procedures (ESAP) to the CNME, and final adoption. It should then be repeated, with a slightly different emphasis probably with less work involved, at three year intervals in order to maintain currency of standards.

A further consideration in the proposed review is costs. An estimate is made of the time required for each phase of the initial review in person/hours to arrive at recommendations to be presented to the Council. At this point in the Council's maturation, it must build a process which, while it may be challenging, is within its abilities to perform in a regular cycle. The Committee believes that, with the dedication that members have so far displayed in the discharge of their responsibilities, the review can be accomplished with present levels of resources. The use of outside assistance for the task may be appropriate.

Though the following review is proposed with little apparent flexibility, it may be that as the work is undertaken, certain lines of investigation prove fruitless and that others may appear that are especially valuable to the purpose of the review. The Committee should have the flexibility to adapt its mandate accordingly as long as the central purpose of establishing and maintaining the validity of standards is effectively pursued.

The CNME's pursuit of membership in the Council on Postsecondary Accreditation (COPA) would provide a collegial environment for this and other tasks of development and stabilization.

Tasks of the Initial Review

1. Given the underlying importance of educational outcomes, the first task of the Committee is to collect and better define the desired outcomes of naturopathic medical education and list them as a proposed amendment to Section III. A. "Mission and Objectives" in the ESAP. It will derive the proposed desired educational outcomes after considering at least the following sources:

- a. present indications of desired outcome in the ESAP (1 hr)
- b. licensing laws for naturopathic physicians of the various states (8 hrs)
- c. the job task analysis for naturopathic physicians developed by ACSI for NPLEX (12 hours)
- d. Standards of Practice of the Arizona Naturopathic Medical Association (3 hrs)
- e. definition of naturopathic medicine developed by the American Association of Naturopathic Physicians (2 hours)

- f. definition of a naturopathic physician published by the U.S. Department of Labor (1 hour)
- g. appropriate parallelism with desired outcomes of professional education for other primary health care professions (40 hours).

When the Committee has developed the proposed list of desired outcomes (three meetings of three hours=27 person/hours), the list will then presented to the Council for adoption.

2. When the desired outcomes are adopted, the Committee will review each standard of Sections II.A. and III of the ESAP and evaluate each for significant contribution to one or more of the desired outcomes or for its necessity in providing an environment to achieve the desired outcomes. They may use the Worksheet of standards developed to facilitate site visits for this phase. (100 person/hours; much of this time needed for review of curriculum guidelines)

3. Each desired outcome will be similarly reviewed to assure that it is adequately addressed by one or more of the standards. (20 hours)

4. The Committee will then make specific recommendations to the Council for additions, deletions, or amendments to the Educational Standards and Accreditation Procedures. (70 person/hours)

Total person-hours = 284

In the effort to assure positive outcomes, however they are defined, it may be tempting to continue to add new requirements as each gap is identified. There is a danger of continuously adding to standards so that it eventually becomes impossible to meet them. Deletion and substitution of requirements must also be considered, i.e. dropping standards that have little effect on quality of education so institutions can efficiently focus on the most valuable efforts. This demands concentration on the essence of naturopathic medical practice and the educational process.

Timeline of Initial Review

Council meetings:

November 1989 - Review process proposed by Committee

Spring 1990 - Review process amended and passed by Council

Fall 1990 - Desired educational outcomes proposed by Committee. May need one phone conference meeting to amend and be adopted as an intended rules change by the Council before a period of public comment.

Spring 1991- Council adopts desired educational outcomes. Between this and the next meeting is a period of intensive detailed review and correlation of standards and outcomes and writing of proposed amendments.

Fall 1991 - Committee proposes amendments to ESAP.

Spring 1992 - Discussion, adjustment, public comment.

Fall 1992 - Adopt amendments to ESAP.

Ongoing cyclical reviews for validity of standards

After the initial validity review, the first ongoing review of standards for validity is proposed to begin in 1992. What is suggested here is what seems reasonable at this time. The future may bring developments in the maturity of the Council that may make some of its elements redundant or inadequate. At some point, perhaps in 1991, these elements of the plan should be re-evaluated.

Tasks of ongoing cyclical reviews

The following cycles need not repeat the development of desired outcomes as in the initial review.

1. The following data will be collected and analyzed for patterns indicative of weakness in institutional performance:
 - a. complaints to the CNME or other accrediting agencies against institutions by students or others
 - b. site visit reports by the CNME or other accrediting agencies at institutions holding status with the Council
 - c. reviews of practice patterns and career satisfaction of naturopathic physicians, such as McCailan's 'Trends in Naturopathic Practice' and the data from schools mandated by the Educational Standards and Accreditation Procedures (1989), pages 11-8 and ff.
 - d. complaints against naturopathic physicians to each of the state licensing boards
 - e. results of standardized licensing exams (NPLEX) for naturopathic physicians
 - f. results of health care outcome studies of naturopathic medicine.
2. Review the state licensing laws, NPLEX job task analysis, and standards of practice for naturopathic physicians for changes and developments since the original derivation of the list of desired educational outcomes.
3. The list of desired educational outcomes developed in the initial review and each of the standards of Sections II. A. and III. will be reviewed in the light of information derived from the above two tasks.
4. The Committee will then make specific recommendations to the Council for additions, deletions, or amendments to the Educational Standards and Accreditation Procedures.

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COUNCIL ON NATUROPATHIC MEDICAL EDUCATION
REPORT ON EXAMINATION OF FINANCIAL STATEMENTS
For The Year Ended December 31, 1988

TED PETERSEN, CPA

TED PETERSEN, CPA
1501 Bank of California Tower
707 SW Washington
Portland, OR 97205
(503) 274-4277

October 30, 1989

Council on Naturopathic Medical Education
Portland, Oregon

I have audited the accompanying balance sheet of the Council on Naturopathic Medical Education as of December 31, 1988, and the related statement of support and revenues, expenses, and changes in fund balance for the year then ended. These financial statements are the responsibility of the Council's management. My responsibility is to express an opinion on these financial statements based on our audit.

I conducted my audit in accordance with generally accepted auditing standards. Those standards require that I plan and perform the audit to obtain reasonable assurance about whether the financial statements are true of material misstatement. An audit includes examining on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. I believe that our audit provides reasonable basis for my opinion.

In my opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Council on Naturopathic Medical Education as of December 31, 1988, and the results of its operations and changes in its fund balance for the year then ended in conformity with generally accepted accounting principles.



Certified Public Accountant

COUNCIL ON NATUROPATHIC MEDICAL EDUCATION
BALANCE SHEET
December 31, 1988

ASSETS

	General Fund
Cash	\$ <u>553</u>
	\$ <u>553</u>

LIABILITIES AND FUND BALANCE

Fund Balance: Unreserved	\$ <u>553</u>
	\$ <u>553</u>

See notes to financial statements.

**COUNCIL ON NATUROPATHIC MEDICAL EDUCATION
STATEMENT OF SUPPORT AND REVENUES, EXPENSES,
AND CHANGES IN FUND BALANCE
For The Year Ended December 31, 1988**

	General Fund
SUPPORT AND REVENUE	
Membership Dues	\$5,305
Other	<u>1,598</u>
	6,903
EXPENSES	
Office and Publications	1,105
Consulting Services	1,900
Travel and Meetings	<u>2,514</u>
	<u>5,519</u>
EXCESS OF SUPPORT AND REVENUES OVER EXPENDITURES	1,384
FUND BALANCE, January 1, 1988	<u>(831)</u>
FUND BALANCE, December 31, 1988	<u>\$ 553</u>

See notes to financial statements.

COUNCIL ON NATUROPATHIC MEDICAL EDUCATION
NOTES TO FINANCIAL STATEMENTS
December 31, 1988

1. DESCRIPTION OF ORGANIZATION AND FUNDS

Organization

The Council of Naturopathic Medical Education was organized to assist naturopathic colleges in receiving accreditation. As the Council is not yet at its anticipated future level of operations, only a general fund is used to account for activities.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting

All amounts are accounted for using the accrual basis of accounting. Under the accrual method of accounting, assets are recorded when title of the goods is passed or services rendered and liabilities are recorded as incurred.

Tax Status

The Council on Naturopathic Medical Education has been granted exempt status as it pertains to payment of federal income taxes.