



Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302  
Arlington, Virginia 22201  
703.247.4212  
703.247.4533 fax  
[www.accsc.org](http://www.accsc.org)

October 4, 2024

**ELECTRONIC DELIVERY**

[REDACTED]  
East West College of Natural Medicine  
3808 North Tamiami Trail  
Sarasota, Florida 34234

**School #M073192**  
**Probation**

Dear [REDACTED]:

At the August 2024 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the decision of the ACCSC independent Appeal Panel to remand for further consideration, the Commission’s January 18, 2024 action to withdraw the accreditation of East West College of Natural Medicine (“EWCNM”) located in Sarasota, Florida. Upon review of the Appeal Panel’s remand decision and the record upon which the Commission made its original decision to withdraw the school’s accreditation, the Commission voted to **vacate the withdrawal of accreditation** action and reinstate the school’s accreditation.<sup>1</sup> Additionally, upon the review of the Commission’s June 14, 2023 Probation and the school’s response, the Commission voted to continue the school on **Probation** with a subsequent review scheduled for the Commission’s **February 2025** meeting. The history of the Commission’s review and reasons for the Commission’s decision are set forth below.

#### **History of the Commission’s Review:**

- At the August 2022 meeting, the Commission considered the Application for Renewal of Accreditation and Application for a Change of Control submitted by EWCNM. Upon review of June 12, 2022 on-site evaluation report and the school’s response, the Commission expressed significant concern and questioned some of EWCNM’s assertions. The Commission determined that additional information was necessary in order to continue the review of the school’s applications and deferred action for review at the September 2022 meeting (see the ACCSC August 12(17), 2022 letter).
- At the September 2022 meeting, the Commission considered the Application for Renewal of Accreditation, Application for a Change of Control, and complaints response submitted by EWCNM. The Commission voted to defer final action in order to provide EWCNM an additional opportunity to demonstrate compliance with accrediting standards in the areas of adequate management and administrative capacity, student services, institutional assessment and improvement activities (“IAIA”), faculty qualifications, refund policy, licensure pass rates, ongoing faculty assessment and professional development, and Program Advisory Committees (“PAC”). The Commission sent a separate letter directing the school to provide additional information pertaining to the complaints in process by ACCSC (see the December 19, 2022 Deferral and the Commission’s December 19, 2022 additional information and complaints letter).
- At the February 2023 meeting, the Commission considered the Application for Renewal of Accreditation, Application for a Change of Control, and complaint process responses submitted by EWCNM. Upon review of the Commission’s December 19, 2022 Deferral, the Commission’s December 19, 2022 additional information and complaints letter, and EWCNM’s responses, the Commission voted to direct EWCNM to receive a Commission-Directed Unannounced On-site Evaluation as part of the continued deferral status. The areas for review included management and administrative oversight, student services, IAIA, faculty qualifications, refund policy, disclosures, PAC, and complaints (see the March 9, 2023 letter and March 29, 2023 On-site Evaluation Report).

<sup>1</sup> With the Commission’s decision to reinstate EWCNM’s accreditation, all processes that have been held in abeyance during the school’s appeal will resume as of the date of this letter.

- At the May 2023 meeting, the Commission considered the March 29, 2023 On-site Evaluation Report from the March 9, 2023 Commission-Directed Visit and the school's response, and voted to place the school on Probation, citing that the school was out of compliance in the following areas: integrity of the record, management and administrative capacity, and faculty maintaining a satisfactory working relationship with students. The Commission also determined that additional information was necessary in the following areas: student satisfaction, IAIA, prior work experience of faculty members and administrators, refund policy, PAC, student complaint policy, financial soundness, verifiable records of graduate employment, and distance education delivery (see the June 14, 2023 Probation).
- At the November 2023 meeting, the Commission considered the October 12, 2023 Probation response submitted by EWCNM and determined that the school failed to demonstrate that the school had adequate management and administrative capacity in place that includes full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). As such, the Commission voted to withdraw the school's accreditation effective January 18, 2024.
- In January 2024 and February 2024 EWCNM submitted its Intent to Appeal a Commission's Decision and Grounds for Appeal respectively.

### **Appeal Panel Decision**

ACCSC's Independent Appeal Panel heard the appeal of EWCNM on April 11, 2024. In a letter dated June 11, 2024, ACCSC's Independent Appeal Panel notified EWCNM that the panel had rejected two of the three grounds for appeal submitted by the school, but found that the amount of time the Commission had allowed for EWCNM to demonstrate compliance in the areas cited in the June 14, 2023 Probation may have been insufficient given information provided in the October 12, 2023 Probation Response and in its February 19, 2024 Grounds for Appeal. Accordingly, the Appeal Panel remanded the matter to the Commission to consider allowing an additional opportunity for the school to submit a response to the issues articulated in the Commission's Probation and to come into compliance with the areas cited therein.

### **Summary of August 2024 Review**

At the August 2024 meeting, the Commission reviewed the Independent Appeals Panel's decision to remand the matter back to the Commission for further consideration. Upon review of the June 11, 2024 Appeals Panel Decision, the June 14, 2023 Probation and the school's response, the Commission voted to vacate the withdrawal of accreditation action and re-instate the school's accreditation. The Commission determined that based on information provided in the Appeal Panel decision letter and the school's October 12, 2023 Probation response, specifically regarding the school's decision to hire external resources to aid the school in taking action to demonstrate compliance, the school should be granted additional time to demonstrate compliance with accrediting standards in the areas cited below.

Based on its review of the materials in the record, there remain areas where the Commission has made a determination that EWCNM has failed to demonstrate compliance with accrediting standard and areas where the Commission has concerns but has not yet made an affirmative finding of non-compliance. The remainder of this letter is divided into those two categories, starting with areas where the Commission has determined the school failed to demonstrate compliance.

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**I. Areas of Non-Compliance with Accrediting Standards**

1. EWCNM has failed to demonstrate that the school has adequate management and administrative capacity in place that includes full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with *Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*. Moreover, the school has failed to make this demonstration since the change of control in accordance with *Section IV (E)(2)(p)(iv), Rules of Process and Procedure, Standards of Accreditation*.

The history of this matter is set forth in the follow documents and incorporated herein by reference:

- June 12, 2022 On-Site Evaluation Report;
- December 19, 2022 Commission Deferral;
- March 9, 2023 Commission Directed-Unannounced On-Site Evaluation and March 29, 2023 On-Site Evaluation Report;
- June 14, 2023 Probation;
- January 18, 2024 Withdrawal of Accreditation; and
- School Responses to the Commission’s Actions.

As the history in this matter shows, the Commission has previously noted its concerns with EWCNM’s operations relative to compliance with accrediting standards. In its June 14, 2023 Probation, the Commission determined that based on the EWCNM’s continued inability to resolve compliance-oriented issues resulting from the school’s operations—even with the new Chief Compliance/Operations Officer position and the changes made to EWCNM’s management structure—that the school was found to be out of compliance with the Commission’s requirements in management and administrative capacity. While EWCNM was planning to make changes to allow for daytime managerial presence, the Commission remained concerned with the current presence and availability of management and oversight at the school especially in light of the shifting roles and responsibilities of the school’s ownership and managements over the period of the review since the change of control.

In the January 18, 2024 Withdrawal letter, the Commission outlined the concerns expressed in this area in **Table 1** below:

**Table 1: Commission Action and Compliance History**

Commission Action and Compliance History	
<p><b>August 2020</b>  <b>Change of Control</b></p> <p><b>Action: Approve</b>  <b>Letter Date: November 8, 2019</b></p>	<p>On March 4, 2020, Acupuncture and Alternative Medicine Clinic, LLC, in accordance with the corporate structure identified below, acquired all assets necessary to operate the above referenced school. The Commission understands the new ownership structure to be as follows:</p> <p>Level 1: Acupuncture and Alternative Medicine Clinic, LLC (100% owner of the school)</p> <p>Level 2: [REDACTED] (50% owner of Level 1)                      [REDACTED] (50% owner of Level 1)</p>

Commission Action and Compliance History	
	ACCSC approved the transfer of accreditation for the school that resulted from this change of ownership and control.
<b>March 2022 On-Site Evaluation                      Renewal of Accreditation                      Change of Control</b>	<b>Team Findings</b> <ol style="list-style-type: none"> <li>1. Management and administrative capacity</li> <li>2. Institutional assessment and improvement activities</li> <li>3. Student satisfaction</li> <li>4. Administrative qualifications</li> <li>5. Faculty qualifications</li> <li>6. Refund policy</li> <li>7. Response submissions/disclosures</li> <li>8. Faculty development</li> <li>9. Program Advisory Committee</li> <li>10. Student complaints</li> </ol>
<b>August 2022 Commission Meeting                      Renewal of Accreditation                      Change of Control</b>  <b>Action: Defer                      Letter Date: December 19, 2022</b>	<b>Areas of Concern</b> <ol style="list-style-type: none"> <li>1. Management and administrative capacity</li> <li>2. Student satisfaction</li> <li>3. Institutional assessment and improvement activities</li> <li>4. Faculty qualifications</li> <li>5. Refund policy</li> <li>6. Response submissions/disclosures</li> <li>7. Faculty development and assessment</li> <li>8. Program Advisory Committee</li> <li>9. Student complaints</li> </ol>
<b>August 2022 Commission Meeting                      Renewal of Accreditation                      Change of Control                      (Student Survey Comments)</b>  <b>Action: Defer for Additional                      Information                      Letter Date: August 12, 2022</b>	At the August 2022 meeting, the Commission considered the Application for Renewal of Accreditation and Application for a Change of Control. Upon review of the June 12, 2022 On-Site Evaluation Report and the school’s response to that report, the Commission determined that additional information is necessary in order to continue the review of the school’s applications. The student survey comments allege that EWCNM may not be in compliance with the Commission’s standards in the areas of institutional eligibility requirements; ownership, management and administrative capacity; physical facilities and emergency preparedness; general program requirements; educational administration; faculty qualifications; general admissions requirements; advising and counseling; student records; student learning; and student assessment.
<b>September 2022 Commission                      Meeting                      Complaints                      Student Survey Comments</b>  <b>Action: Defer for Additional                      Information                      Letter Date: December 19, 2022</b>	At the September 2022 meeting, the Commission reviewed the August 12, 2022 additional information letter regarding student survey comments. The Commission voted to defer final action until the February 2023 meeting. The Commission also considered the two named complaints submitted in February 2022, upon review of the school’s response, the Commission voted to continue review of the complaints in conjunction with the above deferral. The following accrediting standards in question, include institutional eligibility requirements; ownership, management and administrative capacity; institutional assessment and improvement activities; physical facilities and emergency preparedness; general program requirements; educational administration; faculty qualifications and retention; non-discrimination; student

<b>Commission Action and Compliance History</b>	
	satisfaction; student records; transcripts; and student academic progress.
<b>February 2023 Commission Meeting</b> <b>Renewal of Accreditation</b> <b>Change of Control</b> <b>Complaints</b>  <b>Action: Commission-Directed</b> <b>Unannounced On-Site Evaluation</b> <b>Letter Date: March 9, 2023</b>	<b>Areas of On-Going Concern</b> 1. Management and administrative capacity 2. Student services 3. Institutional assessment and improvement activities 4. Faculty qualifications 5. Refund policy 6. Disclosures 7. Program Advisory Committee 8. Complaints 9. Student achievement rates and financials
<b>March 2023 Commission-Directed</b> <b>On-Site Evaluation (Unannounced)</b>	<b>Team Findings</b> 1. Management and administrative capacity 2. Student satisfaction 3. Institutional assessment and improvement activities 4. Faculty qualifications 5. Refund policy 6. Disclosures 7. Program Advisory Committee 8. Complaints 9. Financials 10. Student achievement rates
<b>May 2023 Commission Meeting</b> <b>Renewal of Accreditation</b> <b>Change of Control</b> <b>Complaints</b>  <b>Action: Probation</b> <b>Letter Date: June 14, 2023</b>	<b>Areas of Non-Compliance</b> 1. Integrity 2. Management and administrative capacity 3. Faculty working relationship with students  <b>Areas of On-Going Concern</b> 4. Student satisfaction 5. Institutional assessment and improvement activities 6. Faculty prior work experience and qualifications 7. Refund policy 8. Program Advisory Committee 9. Student complaints 10. Financials 11. Graduate employment verification 12. Distance education

**August 2024 Review and Findings**

At its August 2024 meeting, the Commission took into consideration the Appeal Panel’s June 11, 2024 decision to remand the matter back to the Commission and based on information provided in the Appeal Panel decision letter and the June 14 Probation, 2023, and the school’s October 12, 2023 Probation Response ultimately determined to grant supplementary time to EWCNM to provide the school with an additional opportunity to demonstrate compliance with accrediting standards. In the June 11, 2024 letter, the Appeal Panel noted EWCNM stated in its Probation response that the school has developed

an internal Quality Assurance Committee and also hired external resources to address the school's compliance issues.

With regard to the efforts of the school's internal team, the October 12, 2023 Probation response (pg., 22) describes the Quality Assurance Committee as "responsible for overseeing the implementation of corrective action plans, monitoring progress, and ensuring ongoing compliance with accreditation standards". This committee is comprised of the President, Chief Compliance Officer, Chief Academic Officer, Academic Dean, and Director of Administrative Services. The school included a copy of the committee's August 5, 2023 meeting which indicates the school addressed the following topics: air conditioning repair in the library, the need for regular "check-ins" to monitor compliance, and an update on the progress of policy updates. The Commission found that although the minutes are indicative of some changes, EWCNM did not adequately describe or document the efficacy of the school's efforts.

With regard to the engagement of external resources, the October 12, 2023 Probation response includes a copy of the school's July 20, 2023 PAC Meeting Minutes in which the school's Chief Compliance Officer informed PAC members that EWCNM is "utilizing a consulting and legal team<sup>2</sup>, with one member having previous experience working with ACCSC" and that "[t]hat the team expressed confidence in their ability to address the three issues raised by ACCSC" (*Id.*, pg. 5039). At its August 2024 review, the Commission noted, however, that the school's did not refer to this external resource team elsewhere in the response. There is no description of the individuals involved, the extent and nature of the relationship with the external team, the results of the external resource team's evaluation, or the steps taken as a result of this feedback. Nonetheless, upon review of the recommendation of the Appeals Panel, the Commission recognized EWCNM's apparent effort to supplement the school's own resources.<sup>3</sup>

Based on the totality of its review at its August 2024 meeting, the Commission decided to provide the school with another opportunity to definitively show with evidence that EWCNM leadership has the ability to lead and manage the school in compliance with accrediting standards. Given that EWCNM has been working since July 2023 with the external resource team, the Commission determined that EWCNM has had ample time to implement the necessary changes. Therefore, it is imperative that the school take this opportunity to show the sufficiency, adequacy, and effectiveness of the school's management and administrative capacity to operate EWCNM in compliance with accrediting standards. In doing so, the Commission strongly encourages EWCNM to take advantage of the outside resource team described in the Probation response and to describe the impact of both its internal and external support for the school administration. Any continued failure to demonstrate compliance across the range of issues originally cited in the June 14, 2023 Probation and as cited herein may lead the Commission to reinstate the withdrawal of accreditation adverse decision.

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<sup>2</sup> Hereinafter referred to as "the external resource team."

<sup>3</sup> The Commission advises EWCNM of the following statement contained in *Appendix VIII* of the *Standards of Accreditation*, which is provided to assist an institution undergoing the process of accreditation to understand the perspective of the Commission regarding the utilization of external consultants in the accreditation process: "*It is important to recognize that an institution must demonstrate to the Commission that it is capable of offering programs and services of quality to its students and that the institution has the internal infrastructure, management and administrative capacity, and educational staff and faculty to provide and sustain those efforts.*"

Based on the foregoing, the Commission directs EWCNM to submit the following;<sup>4</sup>

- a. A cogent and comprehensive description of the school’s current management structure and how the individuals engaged in each discreet role in the school contribute to the adequacy, sufficiency, and effectiveness of the overall management and administrative capacity of the school;
- b. A description of how each individual responsible for the management and administration of the school is sufficiently qualified to fulfill their respective roles;
- c. A completed and **legible**<sup>5</sup> [ACCSC Staff Personnel Report](#) for all management and administration personnel to include detailed descriptions of each person’s qualifications;
- d. A current organizational chart that lists all owners, managers, and administrative personnel;
- e. For all personnel listed in Item (a.), complete the following table listing all management and administration personnel, their position, responsibilities, and the days and times that each person is physically on-site at the campus and a justification that this represents sufficient coverage:

Name	Position	Responsibilities	Days / Times on Campus

- f. A list of training activities for all campus leaders, administrators, and managers that has taken place over the last two years in the following format:

Name	Position	Date of Training	Description of Training Activities

- g. A list of upcoming training activities scheduled for the next year;
  - h. An update on the school’s efforts to transition from paper to digital records to include an update of the security of the school’s documents; and
  - i. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
2. EWCNM has failed to demonstrate that a high level of reliance may be placed upon information, data, and statements provided to the Commission by the school (*Introduction, Standards of Accreditation*). The *Standards of Accreditation* state that integrity and honesty of a school are fundamental and critical to the accreditation process and that a compromise of integrity is considered to be an extreme offense. This is described in terms of the basis for the Commission’s decisions in *Section VII (C)(2), Rules of Process and Procedure of the Standards of Accreditation* as follows:

*The Commission meets regularly to review the materials of each school on the agenda. It is concerned with the totality of each school, and views each school in accordance with all of the available information gathered through the accreditation process and other authoritative data contained in the school’s file. The integrity, record, and ability of the school to meet its stated objectives and to meet the standards and criteria established by the Commission provide the*

<sup>4</sup> The Commission reminds EWCNM to ensure that the school does not include personal or confidential student or staff information that is not required for the Commission’s review (e.g., social security numbers, dates of birth, etc.) on any applications, reports, forms or in any response to the Commission. The Commission noted that the school included social security numbers on a number of its backup documentation as part of the previous response.

<sup>5</sup> *Section I (H)(1)(a), Rules of Process and Procedure, Standards of Accreditation* requires that all submissions and notifications to the Commission must be organized and prepared in accordance with any specific instructions issued by the Commission and must be typewritten, clear, and legible.

*foundations for the Commission’s judgment. Strengths are considered along with deficiencies and weaknesses. Above all, the Commission seeks to ascertain to what degree the school meets its objectives in terms of the students and their achievement.*

At the May 2023 meeting, the Commission considered the differences between internal survey results submitted in response to the December 19, 2022 Deferral and the surveys conducted by ACCSC during the March 2022 Renewal On-Site Evaluation and the March 2023 Unannounced On-Site Evaluation and noted the following:

Area	March 2022 Student Satisfaction Renewal Visit 75% (52 of 69)	January 2023 Student Satisfaction Internal Survey 88% (46 of 52)	March 2023 Student Satisfaction Unannounced Visit 32% (17 of 54)
Admissions	85%	100%	66%
Financial Aid	87%	100%	98%
Academic Progress	69%	100%	44%
Student Services	37%	100%	44%
Faculty	78%	100%	56%
Library/Learning Resource System (LRS)	86%	100%	50%
Facility	36%	100%	29%
Training Equipment	53%	100%	33%

The Commission noted that the results of the school’s internal survey indicate every student surveyed selected “Agree” or “Strongly Agree” with all questions, a significantly different response than the surveys conducted by ACCSC. In response to the March 29, 2023 Commission Directed Unannounced On-site Evaluation Report (“CDUOER”), EWCNM stated that the inconsistency with the results were attributed to the timing of the surveys, stating that students surveyed in January were happy because it was the beginning of the term, versus the surveys that were administered in March where students faced various stressors such as midterm exams and dissatisfaction due to disciplinary actions taken by the school with students who violated policies during externship terms.

The Commission noted, however, that the comments from the ACCSC administered surveys did not support the school’s assessment that student stress led to the increased levels of dissatisfaction between the school-administered survey and the ACCSC administered survey. The Commission considered EWCNM’s assessment of the differences in the survey results but did not find the school’s explanation to be convincing and thus again questioned the reliability of the information, data, and statements provided to the Commission by the school.

Additionally, the March 29, 2023 CDUOER noted other areas in which the January 2023 response conflicted with information provided to the on-site evaluation team. EWCNM did not include address the discrepancies directly, thus deepening the questions regarding the integrity of the information, data, and statements provided to the Commission.

In response to the Commission’s Probation, EWCNM asserted that the school “takes its responsibilities and obligations as an ACCSC-accredited institution with absolute seriousness and is committed to re-establishing confidence in the integrity of the data, records, and information provided to the Commission (*Id.*, pg. 21). EWCNM stated that the school’s internal efforts for compliance and improvement include items such as: regular self-assessment, faculty & staff training, student feedback mechanisms, corrective action plans, a quality assurance committee, and ACCSC Training events. The school stated that both ██████████ attended the 2023 Accreditation Workshop and the 2023 ACCSC Professional Development Conference. EWCNM also stated in its response that the school is



“committed to providing complete, truthful, and accurate information and documentation showing the [school’s] compliance with accrediting standards (*Id.*, pg. 24) and provided a number of data validation processes that the school has implemented, to include documentation verification, independent auditing, external validation, and clearer communication.

Regarding the discrepancies in student surveys, EWCNM stated that it is important to take into consideration other factors besides percentages alone, such as student population surveyed, the cohorts being surveyed (same students or different students), and where students were in their programs. Additionally, the school denied any fraudulent behavior and indicated that it has implemented a rigorous data validation process to ensure the accuracy of the data submitted to the Commission.

Specifically, regarding the discrepancies in information on the school’s corrective action plans for the two employees, EWCNM stated that the school made a mistake transposing the dates, attributing the mistakes to “poor judgement and human error” (*Id.*, pg. 23). EWCNM further stated in its response, that the school acknowledges that pre-dating documents is a bad practice that the school will discontinue going forward. As part of the response, the school provided re-signed corrective action forms that include a statement explaining the discrepancy.

At its August 2024 review, the Commission acknowledged the measures that the school has in place to ensure the accuracy of data submitted to the Commission and the corrections to the procedures surrounding documentation related to employee corrective action plans, however, due to the ongoing discrepancies in data provided to the Commission in the past and as part of the Probation response (as noted herein), the Commission remains concerned with the reliability and integrity of the information provided.

It is important to remember that the Commission’s deliberations and decisions are made on the basis of the written record. Accordingly, a school must supply the Commission with complete, truthful, and accurate information and documentation showing the school’s compliance with all accrediting standards if the school is to be granted and maintain accreditation. Regardless of why the discrepancies occur, it is paramount that the Commission is able to rely on the school’s written record to make an accreditation decision. In absence of such reliability, the school cannot meet its obligation to maintain eligibility for accreditation, as outlined in *Section I (G) of the Rules of Process and Procedure, Standards of Accreditation*. Therefore, the Commission will take the totality of the school’s response to this Continued Probation Order into consideration in making a determination regarding the integrity of EWCNM’s record.

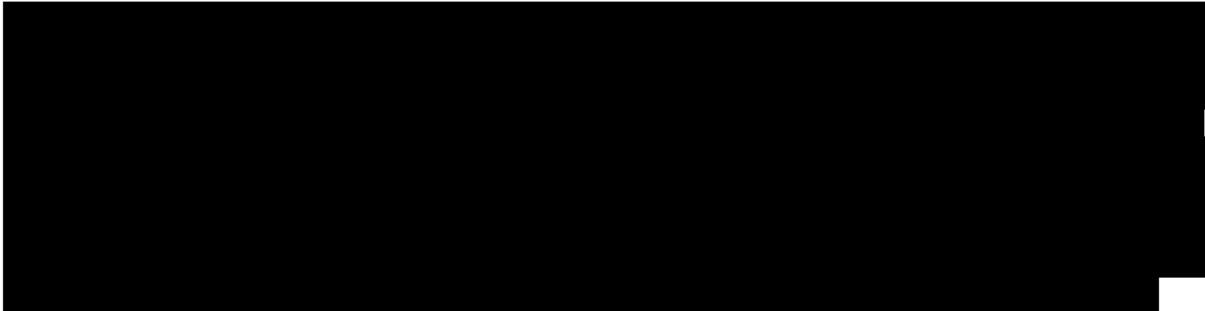
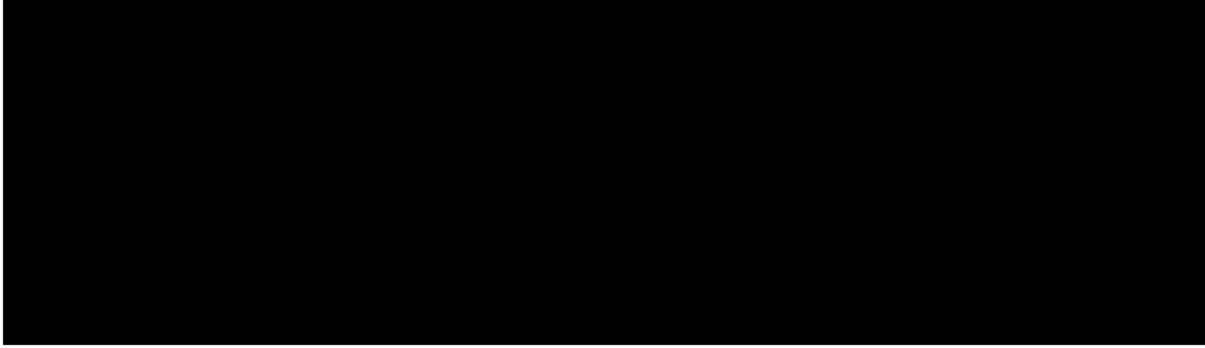
Based on the foregoing, the Commission also requests the school to submit the following:<sup>6</sup>

- a. A description of the school’s internal data validation process to ensure the accuracy of the data submitted to the Commission and
  - b. A justification as to how this internal data validation process is sufficient to ensure the submission of accurate information to the Commission.
3. EWCNM has failed to demonstrate that the faculty maintain a satisfactory working relationship with students (*Section III (B)(1), Substantive Standards, Standards of Accreditation*). The Commission previously questioned the faculty’s working relationship with students as a result of two student complaints submitted in February 2022, containing allegations of the school’s compliance with Title

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<sup>6</sup> A new student survey is being requested in Item #3 below.

IX regulations. The Commission continued to question the appropriateness of the faculty's working relationship with students as a result of the CDUOSE team's finding regarding the institution's utilization of its complaint policy and procedure for handling student complaints (*Section VI (D)(1), Substantive Standards, Standards of Accreditation*).



As part of the school's response to the Commission's request for documentation of any training or corrective action the school has taken regarding the relationship between faculty and students, EWCNM stated:

*Like most Traditional Chinese Medicine (TCM) education institutions, the majority of our teachers are adjunct faculty, meaning that they teach on a limited-term contract. The fact is, we simply had no way to gauge the competence of the faculty and staff of EWCNM before taking full ownership of the institution. Following our assessment after obtaining control, including observing unsatisfactory classroom behavior, and in light of complaints from students, we decided to not renew a number of adjunct teachers" (Id., pg. 35).*

The school stated that as the administration continued to explore the concerns, faculty members left the school in the middle of a program on their own volition and that it was important to note that no faculty was terminated, but instead faculty voluntarily resigned before disciplinary action could be taken (*Id.*, pg. 36). The school also stated, "at no time were any faculty or students ever told they were not permitted to speak to each other" and that the school has "[never] retaliated against any student or faculty member at our school" (*Id.*, pg. 35). EWCNM stated that the school believes that former faculty and staff are still interfering with the school's ability to run effectively and that the school has reported this to the state and programmatic accreditors. The school indicated that the faculty and staff issues caused hardships and put a strain on the relationships between students, faculty, administration, and even the community.

In response to the Commission's request for information relative to faculty teaching experience, EWCNM provided a list of currently faculty and documentation to demonstrate that each faculty has

the requisite teaching experience or has received training to teach residential and distance education courses. The Commission noted, however, that the list of current faculty provided by the school on page 2529 (and 4,978) of the response, is blurry and indecipherable in certain areas. Further the backup documentation provided in response to this area of concern and to item (5.) below includes a large amount of information not organized, preventing verification that faculty are indeed qualified to teach their respective courses. Additionally, the backup documentation for each faculty member, in excess of 1,800 pages, is not organized in a manner that allows for a demonstration of compliance with accrediting standards. Although the school provided bookmarks within the response for each faculty member, the associated documentation is unorganized and includes numerous blank pages, pages turned in multiple directions, multiple pages of continuous documents mixed with other documents, and duplicative information.

Based on the foregoing, the Commission directs EWCNM to submit the following:

- a. Results of a student survey using the [ACCSC Student Survey](#) that shows the school's efforts to ensure a satisfactory relationship between students and faculty have been effective;<sup>7</sup>
- b. A detailed analysis of the student survey results with a particular focus on any results that show less than an 80% rate of student satisfaction;
- c. A table of complaints received by the school since October 2023, to include the duration of how long each complaint was open, and the resolution of the complaint(s);
- d. A clear and legible list of current faculty and the courses they teach;
- e. Documentation, assembled in a way that is easy to navigate (correlated by faculty member and bookmarked) to demonstrate that each current faculty member has teaching experience or has been trained to teach for residential and distance education instruction;
- f. A completed and legible [ACCSC Staff Personnel Report](#) for all management and administration personnel to include detailed descriptions of each person's qualifications; and
- g. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

## II. Additional Areas of On-Going Concern

1. EWCNM must demonstrate that the school remains attentive to student needs (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). In response to the Commission's March 29, 2023 CDUOER, EWCNM submitted examples of implemented changes in response to the school's Graduate Satisfaction Survey. The Campus Effective Planning ("CEP") document provided by the school included 12 of 35 graduate surveys sent in the 2022 calendar year. The Commission noted several areas of satisfaction below 80% (highlighted below) for graduates to include the following:

Survey Selection	Satisfaction %
With my college education I began working in field	83.33
Condition of facilities	43.33
Up-to-date technology & equipment	71.67

<sup>7</sup> Student Survey Results are requested in other sections of this letter. The school may reference to this section of its response for any area where the Commission has mentioned the need for the school to address and demonstrate adequate levels of student satisfaction. There is no need for the school to submit the survey results multiple times in its response, however, please use clear navigation links and bookmarks when making such references.

Survey Selection	Satisfaction %
Instructors were knowledgeable of the subject matter	88.34
Appropriate class materials for course objectives	78.34
Instructors helped me understand the material	78.33
Knowledgeable instructors	82.34
My overall rating of the quality of the program	76.33
My level of satisfaction with my education	73.66
Gave me the skills to do my job well	75.33
Were you satisfied with the school	81.67
Would you recommend the college to others	83.33

In response to the CDUOER, EWCNM provided areas of improvement specifically for “facilities” and “in program,” along with strategies to increase the response rate. The Commission expressed concern that the broad areas of improvement do not take into account the various concerns of graduates across what appears to be a range of issues and areas within the school. Additionally, the Commission was concerned with the school’s strategy to increase response rates which included a process in which, the “Academic Coordinator will now be responsible for distributing Diplomas at least 6 weeks after graduation. This will ensure that graduates maintain communication with Career Services (*Id.*, pg. 563).

In response to the Commission’s Probation, EWCNM stated that the school is no longer holding earned credentials in an effort to increase graduate survey response rates and that the “purpose of the policy was to ensure that graduates were ultimately successful in obtaining employment in the field” (October 12, 2023 EWCNM Response, pg. 38). In response to the Commission’s concerns that the school’s CEP document primarily addressed improvements made to facilities, EWCNM stated that “[b]y addressing specific issues, such as facilities, [the school] aim[s] to create a better overall experience for students” (*Id.*, pg. 37). The school also provided a detailed analysis of the other areas of concern identified by the surveys along with the school’s plans to address the concerns.

While the Commission recognized the efforts being made by EWCNM to improve student satisfaction, the Commission is interested in seeing updated student satisfaction survey results as evidence that the school is effectively addressing the concerns of its students. As such, the Commission will review the student satisfaction survey results as part of the school’s response to Item #3 above.

2. EWCNM must support its reported rates of graduation and employment by maintaining verifiable records (*Section VII (B)(3), Substantive Standards, Standards of Accreditation*) and must be able to justify the classification of each graduate as employed using the Commission’s Guidelines for Employment Classification and must ensure that the employment classifications are verified by the school (*Appendix VII, Guidelines for Employment Classification*).

The Commission previously noted that the employment classification information for the graduates listed in the Graduation and Employment Chart using a July 2023 Report Date included two students identified as in-field placements with the verification source as “Phone call from Employer” (April 17, 2023 EWCNM Response, pg. 837). Additionally, one student listed as Unavailable for Graduation includes a reasoning that states “Still Attending-Active Student Taking Classes” (*Id.*, pg. 836). The Commission reminded EWCNM that per the *Standards of Accreditation*, in cases where a school can show diligent efforts have been made to secure such written documentation without success, the school may rely on its own verbal verification provided that the school maintains documentation with a

signature of school staff attesting that the individual obtained the verbal employment verification from **both** the employer **and** the graduate (*Appendix VII, Guidelines for Employment Classification*). Further, the school was reminded that the Graduation and Employment Chart is intended to track cohorts that have completed a program and that if a student is currently active, the student should be assigned to the cohort that corresponds to the anticipated graduation date. Finally, the Commission noted that 34% of Graduates (10 of 29) within 150% of the program lengths are identified as “Graduates-Further Education” therefore the Commission was interested in obtaining additional information as to why so many graduates chose additional education and whether the current iteration of the program truly leads to employment.

In response to the Commission’s Probation, EWCNM asserted that the school “understands the importance of transparent and verifiable employment verification processes that align with the requirements of ACCSC’s Guidelines for Employment Classification” (October 12, 2023 EWCNM Response, pg. 50). As part of the response, EWCNM provided a copy of the school’s “Employment Verification Procedures,” a blank copy of the school’s Employment Verification form, and copies of graduation employment verification documentation. According to the school’s “Employment Verification Procedures” provided on page 5,090 of the October 12, 2023 Response, students complete the top portion of the “authorization form” to include name, address, contact details, and signature. The next step in the process is for the employer to complete the “Employer to Complete/Verification” section of the form. The Commission noted, however, that the provided procedure is unclear as to how and when the school obtains employment information from the student and employer. Specifically, it appears that the student completes the top portion of the Employment Verification form at an unidentified time during their education and without completing the employment information.

Additionally, the last section of the procedure outlines the school’s process for obtaining verbal verification of employment from the graduate. While the procedure lists specific steps to obtain the information from the graduate via telephone, the Commission noted that the procedure appears to lack any instruction on how the school verifies employment with the employer. As stated previously, per *Appendix VII, Guidelines for Employment Classification*, in cases where a school can show diligent efforts have been made to secure such written documentation without success, the school may rely on its own verbal verification provided that the school maintains documentation with a signature of school staff attesting that the individual obtained the verbal employment verification from **both** the employer **and** the graduate [*emphasis added*].

Included as part of the response, EWCNM provided a table of graduates who gained employment since April 2023, and backup documentation as evidence to demonstrate that the school follows its process for the verification of initial employment of its graduates. The Commission noted, however, that the table of graduates provided on page 5,096 of the school’s October 12, 2023 Response does not include all information requested by the Commission in its Probation letter. Specifically, the school did not include the date of initial employment or the employer’s name, contact address, and phone number. Additionally, the Commission noted multiple inconsistencies in the school’s process further highlighting concerns regarding the accuracy and integrity of the school’s record. Inconsistencies noted by the Commission include (this is not an exhaustive list):

- Campus President signature missing on multiple Employment Verification and Self Attestation forms (examples: *Id.*, pgs. 5,097, 5,100, 5,102);
- Incomplete Employment Verification forms provided for individuals that are not listed on the table provided by the school, making it unclear whether these are current students or graduates (*Id.*, pgs. 5,098 & 5,099);

- Employment Verification forms signed by students and school personnel prior to graduation, in some cases two weeks before graduation;
- Employment Verification forms not signed by graduates or school personnel (examples: *Id.*, pg. 5,158)
- Self-Employment Attestation Forms completed prior to graduation;
- Self-Employment Attestation Forms completed when self-employment is not applicable;
- Graduation dates on forms that do not match graduation dates on the provided table;
- “Employer to Complete / Verification” sections left blank;
- Employment / Company Name missing from Self-Attestation Forms;
- “Office Use Only” section incomplete on all but two forms; and
- Handwritten notes on the backs of forms and strikethroughs of information without initials or explanation of information.

Also, and while not required as part of the school’s response to the Commission’s Probation, EWCNM included copies of “Student Exit Interview” forms as part of the backup documentation; however, the forms appear incomplete, specifically in the Financial Aid, Clinical, and Academic/Administrative department sections bringing into question the school’s process for verifying student eligibility for graduation.

The Commission noted EWCNM’s assertion that the school understands the importance of transparent and verifiable employment classification processes; however, based on what appears to be an incomplete verification process and inconsistencies with the backup documentation provided, the Commission remains concerned with school’s ability to follow its own employment verification process and its ability to maintain verifiable records of graduate initial employment.

In addition, the inconsistencies and incomplete documentation provided in response to the Commission’s Probation in this area further raise concern not only to the school’s ability to provide a thorough and accurate response but also continue to raise question as to the school’s management and administration’s ability to successfully operate a school in accordance with the Commission’s *Standards of Accreditation*.

Based on the foregoing, the Commission directs EWCNM to submit the following:

- a. An updated description of the school’s process and procedures for recording and verifying graduate initial employment, to include the timeframe for which students are required to complete the associated employment verification forms and the timeframe in which the school verifies the employment;
- b. The school’s process for verifying initial employment with the employer and/or graduate, to include the process for when written verification is not obtained;
- c. The school’s current verification form or other tool the school is currently utilizing to verify employment;
- d. Using the table below, provide a list of each graduate who gained employment in a career field for which the school provided education since the school’s October 12, 2023 response:

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Contact, Address & Phone #	Date of Initial Employ.	Descriptive Job Title	Job Duties
1	12345	Acupuncture & Herbal Medicine	7/10/21	7/10/24	Herbal Medicine Practice, John Smith, 123 Sample Way, Anywhere, FL 222.333.1234	9/1/24	Acupuncturist	Acupuncture, Massage, and Herbal Remedies for Patient Care
2	12346	Acupuncture & Herbal Medicine	7/10/21	7/10/24	Acupuncture & Massage Spa, Jane Jones, 456 Main St., Anywhere, FL 222.333.1234	11/14/24	Acupuncturist	Acupuncture, Massage, and Herbal Remedies for Patient Care

- e. The following supplementary information for each graduate identified in Chart (d.) above:
    - i. A copy of the school’s completed verification form for each graduate employed;
    - ii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:
      - The graduate’s name and contact information;
      - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
      - An attestation that the graduate is earning consistent training-related income; and
      - In cases where licensure is required for employment, an attestation that such licensure has been achieved; and
    - iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provide by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school;
  - f. The school’s process for determining student eligibility for completion of the program/graduation and a copy of the ten most recent graduate “Student Exit Interview” forms (if applicable to the school’s process); and
  - g. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
3. EWCNM must verify prior work experience and maintain documentation of academic credentials of all faculty members and administrators (*Section III (A)(4), Substantive Standards, Standards of Accreditation*). Additionally, the school must demonstrate that faculty teaching graduate level courses have a minimum of four years of related practical work experience and a master’s degree in a related field of study (*Section III (B)(10)(a), Substantive Standards, Standards of Accreditation*). The Commission previously noted that the school’s process of verification of previous work experience for faculty members lacked the necessary procedural steps or clarity of the school’s process to ensure faculty possess the requisite work experience. Specifically, EWCNM previously provided a copy of its “New Employee Verification Checklist Form” as part of the school’s updated process for verifying prior work experience; however, the form provided did not include the individual responsible for completing the form, nor the date of when the form was completed. The school’s April 17, 2023 response, again, lacked sufficient details regarding the Commission’s request for clarification on the school’s policy. Specifically, the school provided the same checklist mentioned above along with a

copy of the school's "Faculty Hiring Policy" and "EWCNM New Employee Verification Procedure"; however, the policy and documentation provided did not provide details on when the verification takes place or who is responsible for completing the forms.

Additionally, the Commission noted discrepancies in the Faculty Personnel Reports provided in response to the Commission's December 19, 2022 Deferral and to the March 9, 2023 On-site Evaluation Report. In conversation with the on-site evaluation team during the March 9, 2023 visit, EWCNM indicated that the school was undergoing a transition to electronic faculty files and there appeared to be confusion over the documentation that was provided to the team. Further, the school stated that background checks are completed for each faculty member; however, due to the inability to access the online records system, the school was unable to provide the documentation to the team. With the continued discrepancies in documentation submitted and a lack of procedural details of the school's policy along with the school's inability to provide a complete set of faculty verification documentation, the Commission remained concerned with the school's process of verifying prior work experience and academic credentials of its faculty.

In response to the Commission's June 14, 2023 Probation, EWCNM provided an explanation of the revisions to the new "New Employee Verification Checklist Form" and a description of the procedure used to complete the new form. EWCNM stated in its response that the school "acknowledges the Commission's concerns regarding the lack of procedural details and clarity in [the] faculty verification process" (*Id.*, pg. 41). To address the concern EWCNM stated that the school revised the procedure to include the staff member responsible for the verification process and the timeframe for when the verification takes place. The school also included a "detailed procedure" of the Employee Verification Checklist Form that lists the documentation required and the timeframe for the verification. The Commission noted that while "detailed procedure" includes what appears to be a rubric for staff to follow when verifying new employees, the school did include dates and/or evidence of implementation of the "New Employee Verification Checklist Form." As such, the Commission is interested in further information regarding the implementation of the verification process.

Regarding verification of related prior work experience and academic credentials of its faculty teaching graduate level coursework, EWCNM included a list of current faculty along with backup documentation to demonstrate that each member listed possesses the appropriate years of practical work experience required. As mentioned previously; however, the response includes a large amount of information not organized in a manner that is easy to navigate. Specifically, the faculty lists provided on pages 2,529 and 4,978 of the response are blurry and the "Course(s) Taught)" column indecipherable, making it difficult to verify that faculty are indeed qualified to teach their respective courses. Additionally, the backup documentation for each faculty member, consisting of 1800+ pages of the school's response, is not prepared in a way that allows for easy navigation. Although the school provides bookmarks within the response for each faculty member, the associated documentation is unorganized and includes numerous blank pages, pages turned in multiple directions, multiple pages of continuous documents mixed with other documents, and duplicative information. Additionally, many of the provided documents appear to be missing signatures (*Id.*, pgs. 3,153 & 3,159).

Further, while EWCNM provided ACCSC Faculty Personnel Reports for some of the school's faculty, not all reports appear complete or include all pages of the report. Specifically, the Commission noted duplicate reports for [REDACTED] (*Id.*, pgs. 3,435 & 3,437). Additionally, the Faculty Personnel Report provided for [REDACTED] lists what appears to be general education courses; however, the General Education section of the report is incomplete (*Id.*, pgs. 3,241-3,242). Due to the nature of the response,



the Commission could not determine based on the information provided if faculty and staff do in fact have the appropriate amount of education and practical work experience required.

As such the Commission is interested in additional information and documentation to demonstrate the school's complete employment verification process for its faculty members is in compliance with accrediting standards.

Based on the foregoing, the Commission directs EWCNM to submit the following:

- a. The implementation date of the school's "New Employee Verification Checklist Form";
  - b. A complete and legible list of all current faculty members to include courses assigned to teach, academic credentials earned, date of hire, and applicable licensure information to include expiration dates (the school may use the same chart provided in the previous Probation response given that all areas of the document are clear and legible);
  - c. For any faculty member hired since October 2023, evidence that the school verified prior work experience and academic credentials as required to demonstrate compliance with accrediting standards;
  - d. Completed ACCSC Faculty Personnel Reports for all current faculty members;
  - e. Documentation, organized in a manner that is easy to navigate (e.g. PDF bookmarks, consistent order, etc.), to demonstrate that all faculty members listed above possess the appropriate years of related practical work experience in the subject area taught (documentation should not contain superfluous information not relevant to the verification of prior work experience and academic credentials);
  - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards in the area of faculty verification.
4. EWCNM must demonstrate that the school has and applies a fair and equitable refund policy (*Section I (D)(3), Substantive Standards, Standards of Accreditation*). The Commission previously noted that the school had a late refund resulting from the unexpected resignation of registrars and questioned the school's procedure for determining and providing refunds. Specifically, the school's documentation showed a discrepancy in the Last Date of Attendance and the Date of Determination. In response, EWCNM provided a copy of the school's refund policy and a narrative explanation describing an issue with the school's third-party servicer leading to the non-timely processing of the R2T4 calculation and refund. The school also provided a list of students withdrawn between July 1, 2022 and March 31, 2023, an ACCSC Refund Report for the late refund caused by the school's third-party service provider, and a copy of the school's attendance policy.

At the Commission's May 2023 meeting, the Commission reviewed the school's response and noted that although the school experienced an issue with its third-party servicer, the school continued to have discrepancies in the dates provided on the forms. Specifically, the Commission noted from of the school's response a form which appears to indicate a Date of Withdrawal of August 10, 2022 and a Date of Determination of September 16, 2022 whereas the ACCSC Refund Report Summary Sheet shows a Date of Determination and Last Date of Attendance of September 20, 2022. Given the discrepancy, the Commission determined that additional information was warranted to demonstrate compliance with regards to refunds.

In response to the Commission’s Probation, EWCNM acknowledged the discrepancy in the Date of Withdrawal and Date of Determination provided between the forms and apologizes for the inconsistencies/confusion. The school stated that the discrepancy was a result of human error made by the registrar at the time and the school has since corrected the attendance in the school’s SIS system as well as the school’s internal R2T4 calculation sheet. The school further stated that the R2T4 calculation sheet that was referenced in the Commission’s letter is an internal document for the school and is kept in the student’s file. EWCNM stated that the correct information was sent to the U.S. Department of Education.

In response to the Commission’s request for a list of all students withdrawn between April 1, 2023 and October 1, 2023, EWCNM stated that no students withdrew during that time period requested that required a refund. Further, the school stated that the independent CPA who performed the school’s most recent Title IV Compliance Audit for the fiscal year ending 2022 determined that the school had no late refunds and no errors. EWCNM included a screenshot of the Independent Auditor’s Report for the period ending December 31, 2022.

The Commission noted that although the school stated that the correct information was submitted to the U.S. Department of Education, the school provided no evidence of the submission to confirm that the school processed the refund correctly. Additionally, due to continued discrepancies with documentation provided by the school and because the school stated that there were no withdrawals during the time period requested, the Commission could not determine that the school processes refunds accordingly. Further, while the information provided from the Independent Auditors Report indicates that the school complied with the requirements noted in the auditor’s report for the year ending, December 31, 2022, the discrepancy noted above occurred during calendar year 2022 further qualifying the need for the school to provide evidence that the school processes refunds accurately.

Based on the foregoing, the Commission directs EWCNM to submit the following:

- a. A copy of the school’s refund policy provided to students and as stated in the school’s catalog and enrollment agreement;
- b. A copy of the school’s internal policy for processing refunds, to include copies of any forms that the school utilizes;
- c. A list of all students withdrawn since October 1, 2023 along with an indication for any student owed a refund, organized as below:

Student ID#	Start Date	Last Date of Attendance	Date of Determination	Refund Due Date (If applicable)	Date Refund Paid (If applicable)	Refund Amount (If applicable)

- d. An ACCSC Refund Report for any withdrawn students as listed above with the corresponding Student ID# to include the Refund Report Summary Sheet, Refund Report Worksheet, individual attendance records to include documentation of approved leave of absences (as applicable), and copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student refunds;
- e. Student ledgers for each of the students noted above to include the corresponding Student ID#, demonstrating tuition charges applied, tuition funds paid, and refunds issued, if applicable;
- f. An explanation for any student for whom a refund was made in excess of the maximum number of days identified in the school’s refund policy; and

- g. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards in the area of refunds.
5. EWCNM must demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and the discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). Previously, the Commission noted that EWCNM recorded the following for fiscal year ended December 31, 2021:
- A net working capital deficit,
  - A members' equity deficit,
  - A net loss, and
  - A composite score of [REDACTED] out of 3.0.

In addition, the Commission noted that U.S. Department of Education required an irrevocable Letter of Credit ("LOC") for a late submission of the fiscal year ended December 31, 2020 financial and compliance audits.

In response, EWCNM provided a trial balance as of January 7, 2023 and a profit and loss from January 1, 2022 to January 7, 2023 instead of the six month internally prepared financial statements and the full fiscal year 2022 budget and budget-to-actual analysis as requested. EWCNM did provide a copy of the March 21, 2022 Financial Protection Request – First Year Past Performance for FYE 2020 from U.S. Department of Education and the irrevocable LOC in the amount of [REDACTED] (expiring on May 4, 2027). EWCNM noted in its Management and Discussion Analysis ("MD&A") that the school recorded a net income, positive members' equity, and net working capital for the fiscal year 2022 and additionally developed a plan to explore new revenue streams, reduce expenses, and increase operating efficiency. EWCNM also noted the impact of COVID on the school's financial position and further indicated that regulations, economic conditions, and competition could affect the school financially.

A review of the December 31, 2022 and 2023 financial statements also show the following:

- A Net Working Capital Deficit of [REDACTED] ([REDACTED]) as of December 31, 2023;
- A Net Working Capital Deficit of [REDACTED] ([REDACTED]) as of December 31, 2022;
- Net Cash Used by Operating Activities of [REDACTED] as of December 31, 2022; and
- A Net Decrease in Cash of [REDACTED] as of December 31, 2022

The Commission remains interested in securing additional information as a means to assess the school's current financial soundness and position.

Based on the foregoing, the Commission directs EWCNM to submit the following:

- a. EWCNM's internally prepared financial statements for the 11-month period January 1, 2024 through November 30, 2024, prepared and submitted in accordance with requirements set forth in ACCSC's [Instructions for the Preparation and Submission of Financial Statements and Related Information](#);
- b. An updated MD&A examining and explaining EWCNM's current financial condition and projections for fiscal year 2025;

- c. EWCNM’s full fiscal year 2024 budget and budget-to-actual analysis for the period of January 1, 2024 through December 31, 2024; and
  - d. Any additional information or documentation that EWCNM believes will assist the Commission in determining the school’s compliance with accrediting standards in the area of financial stability.
6. EWCNM must retain responsibility for the quality of the programs and courses of study offered through distance education methods and the achievement of expected and acceptable outcomes, irrespective of any contractual arrangements, partnership agreements, or consortia agreements entered into with third parties for the provision of components of a distance education program or course of study (*Section IX (B)(2), Substantive Standards, Standards of Accreditation*). As noted in the Commission’s June 14, 2023 Probation, EWCNM’s Application for Initial Distance Education was approved on November 2, 2022, however, in the March 29, 2023 student survey conducted during the Unannounced On-Site Evaluation 9 of 14 students expressed dissatisfaction with the delivery and/or quality of distance education at the school. The comments do not make it clear to the Commission that the school has retained the responsibility for the quality of the programs and courses of study offered through the use of distance education methods. In reviewing the school’s response, the Commission found that the quality of distance education has become a substantive issue raised by the comments from the student satisfaction survey.

As a substantive change, this requires an on-site evaluation to verify the school’s responses in the application. Due to the Commission’s Withdrawal of Accreditation action and EWCNM’s subsequent appeal, all processes were paused until the final dissolution of the appeals process. As such, upon dissemination of this action and in accordance with *Section IV (E)(6)(b)(iv), Rules of Process and Procedure, Standards of Accreditation*, EWCNM must receive an on-site evaluation visit from an ACCSC team for the Professional Health Sciences/Oriental Medicine (BS/MA) program currently offered via distance education. The team will include a Distance Education Specialist and a member of the Commission’s staff. ACCSC staff will contact the school to schedule the Initial Distance Education on-site evaluation.

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### **Probation Requirements:**

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

The Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation (Section VII (L)(6) Rules of Process and Procedure, Standards of Accreditation)*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the reasons for the Probation is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies.

**Teach-Out Plan Requirement:**

Given the serious nature of the issues outlined herein, the Commission directs the school to provide a completed Institutional Teach Out Plan Approval Form, which must be submitted as part of the response for the items listed above.

**Maximum Timeframe to Achieve Compliance:**

According to *Section VII (M)(5) Rules of Process and Procedures, Standards of Accreditation*, the Commission may establish timeframes as deemed appropriate for an institution to demonstrate compliance with accrediting standards. Given the nature of the findings contained in this letter, and the history of the matter, the Commission at its February 2025 meeting can take an immediate adverse action to withdraw the school's accreditation or to determine that additional time is warranted for the school to come into compliance with accrediting standards as set forth herein. The maximum timeframe allowed for EWCNM to achieve and demonstrate compliance with the *Standards of Accreditation* began as of the date of the June 14, 2023 Probation letter and will not exceed the timeframe established in *Section VII (M),(5) Rules of Process and Procedures, Standards of Accreditation*. However, please also be advised that the Commission is not required to allow the maximum time frame to remedy noncompliance in all instances and may establish shorter time frames as deemed appropriate and may take an adverse action at its February 2025 meeting as stated above.

**Notification to Students:**

In accordance with *Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*, within **seven days** of receipt of this Probation notification and for the duration of the action, the school must:

- a. Inform current and prospective students in writing that the school has been continued on Probation and provide such notice on the school's website;
- b. Provide a summary that accurately describes the reasons for the Probation; and
- c. Provide the uniform resource locator (URL) where that action can be obtained from the Commission's website.

**Response Requirements:**

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

EWCNM must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with

accrediting standards.<sup>8</sup> If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

EWCNM must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for College 360 DMS Submissions can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before December 18, 2024**. If a response and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before December 18, 2024** the Commission will consider further appropriate action.

For further assistance or additional information, please contact me at [REDACTED].

Sincerely

[REDACTED]

Executive Director

c: [REDACTED]

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<sup>8</sup> ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at [www.accsc.org](http://www.accsc.org).