



Accrediting Commission of Career Schools and Colleges

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March 28, 2025

**ELECTRONIC DELIVERY**

██████████  
Academic Dean  
East West College of Natural Medicine  
3808 North Tamiami Trail  
Sarasota, Florida 34234

*School #M073192  
Continued Probation*

Dear ██████████

At the February 2025 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to vacate the withdrawal of accreditation of East West College of Natural Medicine (“EWCNM”) located in Sarasota, Florida and continue the school on Probation. At its February 2025 meeting, the Commission also considered the November 22, 2024 Commission Directed Distance Education on-site evaluation. Upon review of the October 4, 2024 Continued Probation, the December 11, 2024 On-Site Evaluation Report (“OER”), and the school’s responses, the Commission voted to continue the school on **Probation** with a subsequent review scheduled for the Commission’s **May 2025** meeting.

In addition, subsequent to the Commission’s February meeting ACCSC was made aware of an action taken by the Accreditation Commission for Acupuncture and Herbal Medicine or “ACAHM” to terminate the accreditation of EWCNM’s Master of Acupuncture with a Chinese herbal medicine specialization program effective February 12, 2025. The March 12, 2025 letter from ACAHM outlines twenty-eight (28) areas of non-compliance and an additional fifteen (15) areas of compliance requiring further development. ACCSC’s *Rules* state that the Commission will review and take appropriate action regarding the accreditation status of any school for which the Commission has received an action by an accrediting agency to suspend, deny, or withdraw/revoke accreditation (*Section VII (5)(c)(i), Rules of Process and Procedure, Standards of Accreditation*).

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 the 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”). In addition, the Commission sent a separate

<sup>1</sup> According to the College360 database, ██████████ is listed as the Academic Dean of the institution and the primary contact, however, the email address noted for ██████████ is an email address for ██████████.

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).
- 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 the school as 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 and determined that EWCNM 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.
- At the August 2024 meeting, 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 EWCNM and voted to vacate the withdrawal of accreditation action and re-instate the school's accreditation.<sup>2</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 citing the school as out of compliance in the following areas: management and administrative capacity, integrity of the record, and faculty maintaining a satisfactory working relationship with students. The Commission also determined that additional information was necessary in the following areas: student satisfaction, verifiable records of graduate employment, prior work experience of faculty and administration, refund policy, financial soundness, and distance education delivery (see the October 4, 2024 Continued Probation)

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<sup>2</sup> With the Commission's decision to reinstate EWCNM's accreditation, all processes that were held in abeyance during the school's appeal resumed as of October 4, 2024.

**February 2025 Review and Findings**

**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 following 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;
- October 4 2024 Vacate Withdrawal, Continue Probation;
- December 11, 2024 Commission Directed Distance Education On-Site Evaluation Report; and
- School responses to the Commission’s actions.

As the history in this matter shows, the Commission has expressed its concern that EWCNM has not demonstrated an ability to operate the school in compliance with accrediting standards. In its June 14, 2023 Probation, based on EWCNM’s continued inability to resolve compliance questions despite changes made to EWCNM’s management structure, the Commission found that the school’s leadership had failed to demonstrate an ability to lead and manage a postsecondary institution in compliance with accrediting standards. As such, the Commission determined that the school was out of compliance with ACCSC’s requirements for 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	
<b>August 2020 Change of Control</b>	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

<b>Commission Action and Compliance History</b>	
<p><b>Action: Approve</b>  <b>Letter Date: November 8, 2019</b></p>	<p>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> <p>ACCSC approved the transfer of accreditation for the school that resulted from this change of ownership and control.</p>
<p><b>March 2022 On-Site Evaluation</b>  <b>Renewal of Accreditation</b>  <b>Change of Control</b></p>	<p><b>Team Findings</b></p> <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>
<p><b>August 2022 Commission Meeting</b>  <b>Renewal of Accreditation</b>  <b>Change of Control</b></p> <p><b>Action: Defer</b>  <b>Letter Date: December 19, 2022</b></p>	<p><b>Areas of Concern</b></p> <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>
<p><b>August 2022 Commission Meeting</b>  <b>Renewal of Accreditation</b>  <b>Change of Control</b>  <b>(Student Survey Comments)</b></p> <p><b>Action: Defer for Additional Information</b>  <b>Letter Date: August 12, 2022</b></p>	<p>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.</p>
<p><b>September 2022 Commission Meeting</b>  <b>Complaints</b>  <b>Student Survey Comments</b></p>	<p>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</p>

<b>Commission Action and Compliance History</b>	
<p><b>Action: Defer for Additional Information</b>  <b>Letter Date: December 19, 2022</b></p>	<p>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 satisfaction; student records; transcripts; and student academic progress.</p>
<p><b>February 2023 Commission Meeting</b>  <b>Renewal of Accreditation</b>  <b>Change of Control</b>  <b>Complaints</b></p> <p><b>Action: Commission-Directed Unannounced On-Site Evaluation</b>  <b>Letter Date: March 9, 2023</b></p>	<p><b>Areas of On-Going Concern</b></p> <ol style="list-style-type: none"> <li>1. Management and administrative capacity</li> <li>2. Student services</li> <li>3. Institutional assessment and improvement activities</li> <li>4. Faculty qualifications</li> <li>5. Refund policy</li> <li>6. Disclosures</li> <li>7. Program Advisory Committee</li> <li>8. Complaints</li> <li>9. Student achievement rates and financials</li> </ol>
<p><b>March 2023 Commission-Directed On-Site Evaluation (Unannounced)</b></p>	<p><b>Team Findings</b></p> <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. Disclosures</li> <li>7. Program Advisory Committee</li> <li>8. Complaints</li> <li>9. Financials</li> <li>10. Student achievement rates</li> </ol>
<p><b>May 2023 Commission Meeting</b>  <b>Renewal of Accreditation</b>  <b>Change of Control</b>  <b>Complaints</b></p> <p><b>Action: Probation</b>  <b>Letter Date: June 14, 2023</b></p>	<p><b>Areas of Non-Compliance</b></p> <ol style="list-style-type: none"> <li>1. Integrity</li> <li>2. Management and administrative capacity</li> <li>3. Faculty working relationship with students</li> </ol> <p><b>Areas of On-Going Concern</b></p> <ol style="list-style-type: none"> <li>4. Student satisfaction</li> <li>5. Institutional assessment and improvement activities</li> <li>6. Faculty prior work experience and qualifications</li> <li>7. Refund policy</li> <li>8. Program Advisory Committee</li> <li>9. Student complaints</li> <li>10. Financials</li> <li>11. Graduate employment verification</li> <li>12. Distance education</li> </ol>

### **August 2024 Meeting**

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, the June 14, 2023 Probation, 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. Specifically, in the June 11, 2024 letter, the Appeal Panel noted that EWCNM stated in its Probation response the school has developed an internal Quality Assurance Committee and hired external resources to address the compliance issues.

Based on the totality of the review at its August 2024 meeting, the Commission voted to provide EWCNM 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. In the October 4, 2024 Continued Probation, the Commission noted that the since the school had been working with an external resource team since July 2023, the school has had ample time to implement the necessary changes and therefore it was imperative that the school take the opportunity to show the “sufficiency, adequacy, and effectiveness of the school’s management and administrative capacity to operate EWCNM in compliance with accrediting standards” (pg. 6).

### **November 22, 2024 Distance Education On-Site Evaluation**

As noted in the Commission’s June 14, 2023 Probation, EWCNM’s Application for Initial Distance Education was approved on November 2, 2022, which also required a corresponding on-site evaluation. Concurrently, the Commission was engaged in the change of control and renewal of accreditation process—described above—which resulted in a March 9, 2023 Unannounced On-Site Evaluation. The discrete distance education review required as part of the approval, however, was not included as part of this unannounced on-site evaluation. Nevertheless, as part of the March 29, 2023 visit, the on-site evaluation team surveyed students and the Commission noted that students expressed dissatisfaction with the delivery and/or quality of distance education at the school.

In reviewing the school’s response to the March 29, 2023 OER, the Commission found that the quality of distance education had become a substantive issue raised by the comments from the student satisfaction survey. The comments did not make clear to the Commission that the school had ensured the quality of the programs and courses of study offered through the use of distance education methods. As a result, the Commission directed the school to undergo the required on-site evaluation review for the school’s programs being offered via distance education.

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, the issue of the quality EWCNM programs and courses of study offered through distance education methods and the achievement of expected and acceptable outcomes remained outstanding (*Section IX (B)(2), Substantive Standards, Standards of Accreditation*). As part of the Commission’s October 4, 2024 Continued Probation, in accordance with *Section IV (E)(6)(b)(iv), Rules of Process and Procedure, Standards of Accreditation*, the Commission directed EWCNM to receive an on-site evaluation visit for the Professional Health Sciences/Acupuncture and Herbal Medicine<sup>3</sup> (BS/MS) program offered via distance education. This on-site evaluation occurred on November 22, 2024 and yielded the substantive findings in the following areas: advertising, program length and organization, program advisory

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<sup>3</sup> Formerly Oriental Medicine (MS). The Commission approved a Non-Substantive Modification to change the program name effective April 10, 2024.

committee, timely and meaningful interaction between students and faculty, teaching load, admissions, distance education assessment, and externship.

### **February 2025 Review and Findings**

At its February 2025 meeting, the Commission considered the October 4, 2024 Continued Probation, the December 11, 2024 Commission-Directed Distance Education On-Site Evaluation Report, and the school's responses. Upon review of this history and the school's most recent responses, the Commission determined that based upon the significant concerns that still exist with regard to EWCNM's management and administration's capacity to operate the school in compliance with accrediting standards as well as other significant areas set forth in this letter, the school be continued on Probation.

In response to the Continued Probation, EWCNM provided a description of the experience of the leadership team at the school as well as ACCSC Staff Personnel Reports, a current organizational chart, documentation of training, days and times that leadership is present at the school, and an update on the school's transition from paper to digital records. Upon review of the information provided, the Commission noted that while the individuals leading the school have experience in the field for which the school provides education and have worked at the school for a number of years, the experience noted—e.g., education in the fields of study and teaching—does not equate to management experience specific to operating an accredited institution. The Commission's finding in this regard is not only based on the school's continued failure to demonstrate compliance with accrediting standards but is now also coupled with the school's loss of programmatic accreditation.

As noted in the Commission's October 4, 2024 Continued Probation letter, one of the factors that lead to the Appeal Panel's recommendation and the Commission's decision to vacate the withdrawal action was that the school claimed in its October 12, 2023 Probation response that EWCNM was using a consulting and legal team that includes one individual with experience working with ACCSC (pg. 5039). The Commission noted, however, in that letter that the school did not provide any description of the individuals involved, the extent and nature of the relationship with the external team, the results of the team's evaluation, or steps taken as a result of the feedback (October 4, 2024 Continued Probation p.6). Despite these failures, the Commission took the Appeals Panel's recommendation and provided the school additional time and opportunity. However, EWCNM has again failed to provide any additional information regarding the consultant or any other external resources that the school is utilizing to aid the school in coming to compliance with standards. As such, the Commission remains concerned about the school's ability to not only come into compliance with accrediting standards but to remain in compliance on a go-forward basis.

In review of the documentation provided with regard to the management and administrative leadership team of the school, the Commission again noted multiple inconsistencies with regard to the information submitted. For example, in response to item #I (1E) of the Commission's October 4, 2024 Continued Probation, in which the Commission requested a table of all management and administration personnel, their position, responsibilities, and schedule that each individual is on-site at the campus, the school provided information for [REDACTED]. The Commission noted that no information was provided for the following individuals identified in Item #1A of the school's response as management and administrative personnel: [REDACTED]. The Commission also noted that the individual listed as the Campus Director, [REDACTED], is only on campus part time Tuesdays and Thursdays. According to ACCSC's records [REDACTED] is listed as the Academic Dean and main contact for the school; however, the school did not provide information regarding the days and times that [REDACTED] is on-site at the school or his day-to-day responsibilities in the operation of EWCNM.

Further, in response to Item #I (2) of the Continued Probation, EWCNM provided its policy for the verification of graduate initial employment in which the school references a Director of Education and Career Services Coordinator, neither of which is included in the school's organizational chart. The school also refers to a Chief Compliance Officer in response to Item #I (2) and a Human Resources Verifier and Academic Coordinator in response to Item #II (3) of the Continued Probation, none of which is listed in any of the school's documentation, highlighting the Commission's concern with regard to the management and administration team and their roles at the school. The school also lists a Compliant Officer (Consultant) on the provided organization chart, however, no additional information is provided on this individual with regard to their experience, roles/responsibilities with the school, or timeframe for which the individual has been/will be consulting for the school.

Given the repeated concerns regarding EWCNM's management and administrative capacity and the slew of additional compliance areas the school's leadership has continually failed to address, coupled with the questions raised during the November 22, 2024 Distance Education on-site evaluation and the school's recent loss of programmatic accreditation, EWCNM has not demonstrated an ability or willingness to operate the school in compliance with standards or to meet its burden and obligation to comply on a continuous basis with accreditation standards and requirements.

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

- a. A current, complete, and accurate list of all management and administrative personnel at the school along with their respective job duties, to include those individuals identified throughout the school's response as the Career Services Coordinator, Chief Compliance Officer, and Director of Education;
- b. A current, complete, and accurate organizational chart listing all management and administrative personnel;
- c. Information regarding the individual identified as the school's "Compliant officer (consultant)" in the school's organization chart, to include when this person was retained, how often the individual is on campus, and how long this person will be assisting the school;
- d. If the individual identified in (c.) is not a full-time employee of the school, provide a narrative description of the school's plans for ongoing compliance should the individual leave;
- e. A narrative explanation and documentation to demonstrate that the management and administration of the school have sufficient experience in managing an institution. This experience should not include academic teaching experience;
- f. A description of how the identified Campus Director (██████████) is on campus for a sufficient amount of time to serve in the role as Campus Director;
- g. A description of the day-to-day roles and responsibilities of the campus contact identified in the school's College360 profile as the Academic Dean; and
- h. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

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<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.



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 Commission previously expressed concern with regard to discrepancies in student satisfaction survey results, conflicting information provided in school responses versus a finding by an on-site evaluation team, and inaccuracies in data submitted to the Commission. The school was reminded in the October 4, 2024 Continued Probation that the Commission’s deliberations and decisions are made on the basis of the written record and therefore a school must supply the Commission with complete, truthful, and accurate information and documentation showing the school’s compliance with all accrediting standards. The Commission stated in the letter that the totality of the school’s response would be taken into consideration when making a decision on the school’s compliance in this regard. The Commission also requested that the school submit a description of the school’s internal data validation process and a justification as to how the process is sufficient to ensure the submission of accurate information to the Commission.

In response to the October 4, 2024 Continued Probation, EWCNM stated that the school conducts regular self-assessments, weekly audits of student files conducted by the Chief Compliance Officer and Chief Academic Officer, comprehensive training sessions, and student surveys. As part of its regular self- assessment, EWCNM stated that the school has created “Internal Data Validation Processes” which includes processes for documentation verification, independent auditing, external validation, and improved communication protocols. Although the school provided a very brief description of the weekly auditing process and a copy of the school’s weekly audit schedules and completed checklists, the Commission noted that the school did not include information as to the number or percentage of student records that are validated/audit or whether any of the audits yielded any missing information or findings that warranted corrective action. The school also stated that the Chief Compliance Officer and Chief Academic Officer conduct the audit, however, the Commission continues to question who is acting as the Chief Compliance Officer and how often this individual is involved in the process.

When deficiencies are identified during the process, EWCNM stated that the school develops a corrective action plan that is then overseen by the school’s Quality Assurance Committee. Upon review of the backup documentation provided by the school as evidence of meetings conducted by the Quality Assurance Committee, the Commission noted that the school appears to have a number of different oversight and review committees. Specifically, EWCNM included as part of the response, “Exhibit 2D: Quality Assurance Committee meeting minutes and progress reports” which at first glance appears to be a list of meetings of the school’s Governing Oversight Committee or “GOC” conducted since 2022; however, the corresponding documents provided in the exhibit include minutes of several different committees—e.g. Governing Oversight Committee, Program Advisory Committee, Governing Board, and Advisory Committee/Panel. The Commission also noted that the school provided the same list of meetings in response to the December 11, 2024 OER, however, instead of the list being called a “GOC Meeting list” its called a “PAC Meeting list” with the same dates and backup documentation. In summary, the school made a claim that there are Quality Assurance Committee meetings and then proceeded to provide minutes of other different committee meetings as evidence of the Quality Assurance Committee. This raised the question as to whether the school is in fact conducting Quality Assurance Committee meetings as described or is simply submitting all committee meeting minutes in an effort to obfuscate that the Quality Assurance Committee is not in fact meeting.

The Commission noted that while the school is creating new processes for self-assessment and data validation, the continued inability of the school to provide accurate and reliable information again raises significant concern as to whether the school has supplied the Commission with complete, truthful, and accurate information and documentation showing the school’s compliance with all accrediting standards.

It is fundamental and critical that EWCNM establish that the Commission may place a high level of reliance upon information, data, and statements provided to the Commission by the school.

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

- a. A list of the school's oversight and review committees along with a description of the responsibilities, composition, and the frequency of when each committee meets;
  - b. The name of the individual serving as the school's Chief Compliance Officer along with a description of the individual's duties and responsibilities;
  - c. A narrative description of the school's process for weekly audits of student files, to include the individuals responsible for conducting the audits, the number or percentage of files audited, and a list of materials reviewed as part of the audit;
  - d. An executive summary of any findings of the weekly student file audits; and
  - e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
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 IX regulations. The Commission continued to question the appropriateness of the faculty's working relationship with students as a result of the March 29, 2023 Commission Directed Unannounced On-Site Evaluation 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*). Further, at the May 2023 meeting, the Commission determined that based on the history of complaints, the school failed to demonstrate that the faculty maintain a satisfactory working relationship with students. As part of the June 14, 2023 Probation, the Commission requested information with regard to faculty teaching experience. The Commission reviewed the school's response at its November 2024 meeting and determined that the supporting documentation provided by the school was blurry, indecipherable, and unorganized and as such warranted additional information to demonstrate compliance. Accordingly, the October 4, 2024 Continued Probation directed the school to provide updated student survey results, a list of complaints that the school received since October 2023, a clear and legible list of current faculty and the courses being taught, and documentation to demonstrate that each current faculty member has teaching experience or has been trained to teach for residential and distance education courses as applicable.

In response to the October 4, 2024 Continued Probation, EWCNM stated that the school "acknowledges the gravity of the issues raised and are committed to demonstrating full compliance with **ACCSC's Substantive Standards**" (EWCNM's January 7, 2025 response, pg. 17). The school also provided results of a September 2024 internal student survey conducted by the school, a table of complaints received by the school since October 2023, a list of all current faculty members and the courses they teach, as well as ACCSC Staff Personnel Reports for all faculty. Upon review of the September 2024 student survey, in which the school surveyed 70% (19 of 27) of students, the Commission noted that the level of student satisfaction appears to be favorable. However, there are still lingering questions with regard to student satisfaction based on student survey information provided by the school in the December 11, 2024 OER, which are addressed in more detail later in this letter.

With regard to the complaints received by the school since October 2023, EWCNM provided information for one student complaint along with evidence of the school's documentation showing how long the complaint was open and the resolution of the complaint. The Commission noted that although the school was able to provide documentation for one student complaint, given the history of concerns with faculty working relationships with students, the Commission remains interested in ensuring that all faculty, management, and administration staff have undergone proper Title IX training.

Finally, to demonstrate that training has occurred for faculty and staff, EWCNM provided a list of training activities that have taken place over the last two years as well as copies of training certificates for the following individuals: [REDACTED]

[REDACTED] Regarding distance education training, the school indicated that all faculty had attended the Advance Google & Quilgo training in 2023. Upon review of the training certificates provided for the faculty listed above, the Commission noted that the certificates include the EWCNM logo at the top and [REDACTED] signature at the bottom, indicating that the training was provided by the school. Given the number of concerns raised during the November 22, 2024 distance education on-site evaluation, and the history of concerns with faculty working relationships with students, the Commission is also interested in further information regarding the appropriateness of the school administrators providing distance education trainings faculty at the school in light of some many education related issues.

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

- a. Documentation demonstrating that faculty, staff and the school's management and administrative personnel have participated in Title IX training. If training has not occurred for all faculty and staff, provide a timeline of when the training is scheduled to occur;
  - b. An explanation of and justification for the training that faculty teaching distance education are required to undergo, to include information regarding the topics covered, the qualification of the instructors for the training, the length of the training, and how often faculty are required to attend distance education training;
  - c. Evidence of training for all faculty members teaching distance education; and
  - d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
4. EWCNM has failed to demonstrate that the school supports its reported rates of graduation and employment by maintaining verifiable records, is able to justify the classification of each graduate as employed using the Commission's Guidelines for Employment Classification, and ensures that the employment classifications are verified by the school (*Section VII (B)(3), Substantive Standards, Standards of Accreditation and Appendix VII, Guidelines for Employment Classification*). In its June 14, 2023 Probation, the Commission outlined concerns with regard to the school's process for recording and verifying graduate initial employment, specifically as it relates to in-field placements and graduates classified as "Graduates-Further Education." As such, the Commission directed EWCNM to submit a description of the school's process and procedures for recording and verifying graduate employment, copies of current verification forms or tools that the school was utilizing, and a list of all graduates along with supporting documentation who gained employment since April 17, 2023. In review of the school's October 12, 2023 response, the Commission noted additional concerns with the school's process and procedures as well as multiple inconsistencies with the backup documentation provided to

include missing school signatures, dates, and incomplete sections on multiple employment verification and self-attestation forms.<sup>5</sup>

As part of the October 4, 2025 Continued Probation, the Commission directed EWCNM to again provide an updated description of the school's process and procedures for recording and verifying graduate initial employment, the timeline for when the verifications occur, a copy of the current form or other tools that the school is utilizing to verify employment, and a list of a list of all graduates that gained employment in the field for which the school provided education since the school's October 12, 2023 response. In response, EWCNM provided a copy of the school's Placement Services and Follow-up Plan, a blank copy of the school's employment verification form, and a list of graduates along with backup documentation to demonstrate the verification of employment by the school.

Upon review of the school's Placement Services and Follow-up Plan, the Commission questioned again the school's process and timeline for recording and verifying graduate initial employment. Specifically, the provided policies and procedures includes a "Career Services Philosophy," "Mission and Goals of the Career Services Department," a broad overview of the responsibilities of the Career Services Department, and a list of information that is to be collected from all graduates to include employment information. The Commission noted, however, that while the school appears to collect graduate information, the policy lacks specifics on the verification process itself such as when and how the data is collected, how the information is verified to include the timeframe for verification, and the different types of verification required. Additionally, while the policy states that the Career Services Coordinator will collect the information, it remains unclear as to who is responsible for verifying the employment. According to the school's provided organizational chart and list of management and administrative personnel [REDACTED] is listed as Admissions Assistant/Career Services, however in the description of job duties, [REDACTED] appears to provide clerical support for the different departments. Further, upon review of the completed employment verification forms provided as part of the response, the "Career Services Printed Name" field is incomplete on every form. As such, the Commission questioned who at the school is acting as the Career Services Coordinator and what that person's specific roles and responsibilities are when it comes to the school's employment verification process. The policy also indicates that the Career Services Coordinator works with the Director of Education, however, the school does not list anyone serving in that role of Director of Education in the school's organization chart.

Finally, the Commission noted that in addition to the questions of who is acting in the roles identified in the school's policy, the policy appears to reference a different school. Specifically, in the "Annual Evaluation of Services" section, the policy states, "At Medtech, we strive..." (pg. 351) bringing into question whether the policy provided is indeed the school's policy that has been adopted and implemented. As mentioned in Item #2 of this letter, this reference to another school casts a dubious pall over the integrity and reliability of the school's response.

In addition, in multiple sections of the school's policies and procedures, the school makes reference to "completers" and "graduates," defining each on page 350 as the following:

*"Completer - A student who has demonstrated the competencies required for a program and has been awarded the appropriate credential (graduate completer) or has acquired sufficient competencies through a program to become employed in the field of education pursued or a related field as evidenced by such employment (non-graduate completer).*

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<sup>5</sup> See Commission's October 4, 2024 Continued Probation, pgs. 13-14.

***Graduate** – A student who has demonstrated the competencies required for a program and has been awarded the appropriate credential by an institution.”*

The Commission questioned the scenarios in which each of the defined roles above is utilized by the school in the employment verification and reporting processes. Specifically, in the instance of the seven graduates provided as part of the school’s response, the Commission questioned whether those individuals are categorized by the school as a “graduate completer” or “non-graduate completer.” Even more importantly, if the non-graduate completers are able to obtain employment in the career field without a credential, the Commission questions the necessity of the credential awarded by the school.

Upon review of the list and backup documentation for all graduates placed in a career field for which the school provided education since October 12, 2023, the Commission noted that of the seven graduates provided, the following five graduates do not appear to be employed in a related field for which the school provides education:

- Graduate ██████ – Administrative Assistant/Career Services, EWCNM
- Graduate ██████ – Flight Attendant, Southwest Airlines
- Graduate ██████ – TA, East West College of Natural Medicine
- Graduate ██████ – Server
- Graduate ██████ – “N/A”

For graduate ██████ the chart provided on page 22 of the school’s response lists “Massage Therapist,” however, the employment verification form provided by the school lists “TA” at EWCNM. While the remaining two graduates are listed as employed as a “Massage Therapist,” the Commission questioned whether the job duties of a massage therapist align with the objectives of the program. While the Commission acknowledged that a graduate could be employed as a massage therapist while in the process of obtaining licensure as an acupuncturist, the graduate at that time would not be classified as employed in-field. Additionally, the backup documentation provided raises questions not only to the school’s classification of an in-field placement but also with regard to the school’s process for verifying graduate employment. Specifically, graduate ██████ is listed as employed as a Licensed Massage Therapist, however, the graduate checked “No” next to the question, “[d]id the skills, tools and knowledge provided by the college help lead to your hiring in your field or help you maintain your current position?” Graduate ██████ is listed on the table as a Massage Therapist, however, the job title field on the verification form is blank. For the same graduate, while the job duties list “Office Manager, Massage Therapist, Acupuncturist waiting for License” as stated previously, if licensure is required to be employed as an acupuncturist and the graduate is awaiting licensure, then individual cannot be classified as employed in-field as they are not legally able to work in the field.

The serious nature of the concerns outlined above bring into question not only the integrity, reliability, accuracy, and completeness of the information provided by the school, but also whether the school has placed **any** graduates in the field for which the school has provided education since October 2023, or perhaps prior.

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

- a. An updated description of EWCNM’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. A justification for the classification of “in-field” placements for the seven students provided in the school’s January 7, 2025 response;
- c. A list of school personnel involved in the school’s employment verification process to include the name of the individual serving as the school’s Career Services Coordinator and the individual serving as the Director of Education;
- d. A narrative explanation as to how the school utilizes the designations of “Graduate-Completer” and “Non-Graduate Completer” in the ACCSC employment verification process;
- e. Using the table below, provide a list of each graduate who gained employment **in a career field for which the school provided education** since October 2023

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Contact, Address & Phone #	Date of Initial Employ.	Descriptive Job Title	Job Duties in Alignment with Program Objectives
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

- f. 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;
    - 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; 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 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, 2022 and 2023:

- A Net Working Capital Deficit of [REDACTED] as of December 31, 2023;
- A Net Working Capital Deficit of [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.

In response to the October 4, 2024 Continued Probation, EWCNM submitted internally prepared financial statements for the 11-month period January 1, 2024 through November 30, 2024, an updated MD&A, and a copy of the school's full fiscal year 2024 budget and budget-to-actual for the period January 1, 2024 through December 31, 2024. Upon review of the information submitted, the Commission noted the internally prepared statements for the 11-month period January 1, 2024 through November 31, 2024 show only an accumulated deficit of [REDACTED].

EWCNM noted in its Management and Discussion Analysis ("MD&A") that as of December 18, 2024, the school recorded a [REDACTED] decrease in revenue [REDACTED] as a result of a decrease in student enrollment and patient visits in the acupuncture programs. EWCNM decreased its expenses by [REDACTED] with the reduction in staff and expenses for rent and maintenance. EWCNM's financial improvement plan for 2025 includes reducing expenses without compromising the quality of educational offerings, enhancing revenue by marketing to increase enrollment and tuition revenues, and efficiently streamlining operations and administrative processes.

EWCNM also provided the full fiscal year 2024 budget and budget-to-actual for the period of January 1, 2024 through December 31, 2024; however, the document provided is blurry and the font is too small to review. As a result, the Commission found the budget-to-actual unusable as a resource and 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. A complete and legible fiscal year 2024 budget and budget-to-actual for the period of January 1, 2024 through December 31, 2024;
  - b. EWCNM's internally prepared financial statements for the 12-month period January 1, 2024 through December 31, 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](#);
  - c. An updated MD&A examining and explaining EWCNM's current financial condition and projections for fiscal year 2025;
  - d. EWCNM's full fiscal year 2025 budget and budget-to-actual analysis for the period of January 1, 2025 through March 31, 2025; and
  - e. 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.
2. EWCNM must demonstrate that the school verifies prior work experience and maintains documentation of academic credentials of all faculty members and administrators (*Section III (A)(4), Substantive Standards, Standards of Accreditation*). Previously the Commission raised concern with the school's

process for verifying prior work experience of faculty members, noting that the process lacked the necessary procedural steps or clarity to ensure that faculty possess the requisite work experience. While the school has provided in the past a copy of its New Employee Verification Checklist Form, the Commission has had to request multiple times, additional information on the school's policy specifically with regard to who completes the verification and when the verification is completed. The Commission noted in the October 4, 2024 Continued Probation that while the school provided additional detail of the procedure to include a rubric for staff to follow, the school again did not include dates of when the verification takes place and/or evidence of implementation of the New Employee Verification Checklist. As such the Commission requested specific information with regard to the implementation date of the school's New Employee Verification Checklist as well as evidence that the school verified prior work experience and academic credentials for any faculty member hired since October 2023.

In response to the October 4, 2024 Continued Probation, EWCNM provided ACCSC Faculty Personnel Reports, a list of all current faculty and their credentials, a copy of the school's Faculty Recruitment and Hiring Policy, as well as a sample of the school's New Employee Verification Checklist. Upon review of the information submitted, the Commission noted that EWCNM still did not answer when the school implemented the New Employee Verification Checklist Form as directed in Item #II (3)(a), page 17 of the Commission's October 4, 2024 Continued Probation. The school stated in the response that, "[t]he submission includes documentation of the implementation date for EWCNM's *New Employee Verification Checklist Form*"; however, the corresponding documentation is simply a blank copy of the verification form. Additionally, the top of the form includes information on who is responsible for completing the form, listing the "Academic Coordinator or Office Manager w/ Chief Compliance Officer Final Approval" (January 7, 2025 EWCNM Response, pg. 403). The Commission noted however, that the bottom of the form includes signature fields for the "EWCNM Human Resource Verifier" and the "EWCNM Administrator." According to the school's organizational chart, it was unclear who serves as the "Human Resources Verifier" serving as an additional example of where information provided by the school appears inaccurate or inconsistent.

In response to the Commission's request for evidence that the school verified prior work experience and academic credentials for any faculty member hired since October 2023, EWCNM stated in the response that "[f]or any faculty member hired since October 2023, evidence of the verification process for prior work experience and academic credentials is provided. This documentation confirms compliance with accrediting standards and ensures that all faculty possess the requisite qualifications to teach their assigned courses" (*Id.*, pgs. 24-25). The corresponding backup documentation provided in response to this area includes a list of all faculty/staff at the school along with their hire date, academic credentials, whether they are full-time or part-time, and whether they were hired after October 2023. The Commission noted, however, that while the school stated that the requested documentation for all faculty hired since October 2023 was provided, according to the backup documentation, it does not appear that any faculty have been hired in that timeframe, and instead the school submitted documentation for current faculty, regardless of hire date.

The Commission acknowledged that the school has not hired any additional faculty/staff in the time period for which the verification forms were required as evidence of implementation of the school's policy. However, given the school's past issues in this area, the Commission remains interested in whether the school verifies prior work experience/academic credentials.

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

- a. The date that the school implemented the New Employee Verification Checklist;



- b. An explanation of the different individuals responsible for completing the New Employee Verification Checklist to include who is currently serving as the Academic Coordinator and EWCNM Human Resource Verifier;
- c. A list of any faculty/staff hired since December 2024 along with evidence that the school verified prior work experience and academic credentials as required to demonstrate compliance with accrediting standards, as applicable; and
- d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

### III. November 22, 2025 Distance Education On-Site Evaluation

#### History

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 student survey conducted as part of the March 9, 2023 Unannounced On-Site Evaluation, students expressed dissatisfaction with the delivery and/or quality of distance education at the school. The comments did not make clear to the Commission that the school had 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 had become a substantive issue raised by the comments from the student satisfaction survey and directed the school to undergo an on-site evaluation visit for the school's programs being offered via distance education.

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, the issue of the quality EWCNM programs and courses of study offered through distance education methods and the achievement of expected and acceptable outcomes remains outstanding (*Section IX (B)(2), Substantive Standards, Standards of Accreditation*). As such, the Commission's October 4, 2024 Continued Probation, in accordance with *Section IV (E)(6)(b)(iv), Rules of Process and Procedure, Standards of Accreditation*, directed EWCNM to receive an on-site evaluation visit from an ACCSC on-site evaluation team for the Professional Health Sciences/Oriental Medicine (BS/MA) program offered via distance education. This on-site evaluation occurred on November 22, 2024 and resulted in the December 11, 2024 report to which the school was given an opportunity to respond. The Commission reviewed the December 11, 2024 OER and the school's response at the February 2025 meeting.

#### **February 2024 Meeting**

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 (*Section IX (B)(2), Substantive Standards, Standards of Accreditation*). Given the serious nature of the concerns highlighted below, the Commission will take the totality of the school's response into consideration regarding the school's ability to deliver education via distance education.

1. EWCNM must demonstrate that the school is able to justify the number of hours estimated and types of assignments for out-of-class work/preparation and that the estimated number of hours awarded conform to generally accepted practices in higher education (*Section II (A)(3)(f&g), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school was unable to justify the number of hours estimated for the out-of-class work/preparation for online coursework. Specifically, the team stated that the school could not provide information on how it estimates time to complete assigned readings referenced as out-of-class work and/or that the readings met the hours

approved for the credit hours awarded. In response to the December 11, 2024 OER, EWCNM stated that the school has conducted a comprehensive review of all courses in the program and took action to establish clear policies to estimate the time required to complete out-of-class work. EWCNM stated that to address concerns that the team had regarding excessive or inconsistent time allocations for reading assignments, the school worked with faculty to develop a rubric to standardize the estimation of time required for the various assignments. As part of the response, the school provided an explanation of the rubric that the school developed and stated that faculty are now required to include a clear breakdown of hours in syllabi for the courses. The school included an example of a revised syllabus as well as a copy of the school's "Workload Policies."

Upon review of these Workload Policies, the Commission noted that the estimation of out-of-class work/preparation includes the school's definition of a credit hour, definition of out-of-class work, and the school's "Estimation Method" or rubric for faculty to use to estimate out-of-class work hours. Also included in the policies are requirements that faculty include a clear breakdown of out-of-class expectations for the course and a reference to the specific rubric used. The Commission noted, however, that the rubric includes a list of out-of-class hour requirements per credit hour for each course but does not include a justification for the hours allotted for out-of-class work. Upon review of the school's "Workload Policies" provided as Exhibit 2B of the response, the Commission noted that the document is actually titled "Teaching Load Policy" and outlines the teaching load, course development time, and the sharing of instructional responsibilities (January 22, 2025 EWCNM Response, pg.108), none of which address the team's finding with how the school estimates out-of-class work/preparation. The Commission did note that the school provided a Time-to-Task Analysis in response to another section of the team's OER, however, the school does not refer to the document here and instead provides the aforementioned information that does not appear to fully address the concern with regard to out-of-class work/preparation.

Further, upon review of the revised syllabi provided as part of the school's Exhibit 2A, the Commission noted that the WS417 Anatomy & Physiology II syllabus lists the chapter/topics scheduled to be covered each week as well as the weekly reading/homework assignment estimated, per the syllabus provided, to be four hours per week (*Id.*, pg. 106). The Commission noted, however, that the reading/homework column includes "Lecture" and "Weekly Review" as well as reading assignments that for some weeks are only two or three pages. For example, the reading assignment listed for week 2 includes pages 181-183, and the reading assignment for week nine includes pages 354-357. In looking at the syllabus provided as part of the school's response to Finding #3 of the OER, the reading/homework assignment for WS504 Pathophysiology II also includes lectures and weekly reviews as well as reading assignments that do not appear to equal the hours estimated by the school for out-of-class work. Furthermore, the school lists 120 hours of homework on the first page of the syllabus for WS504 Pathophysiology II, however, the weekly schedule for the course lists 4 hours/week of reading/homework for a total of 15 weeks which equates to only 60 hours of out-of-class work/preparation, not 120 as listed on the first page of the syllabus (*Id.*, pg. 110). Based on the information provided, the Commission questioned the number of didactic hours versus out-of-class work/preparation hours as well as how the homework/reading assignments conform not only to the school's own rubric but also to generally accepted practices in higher education.

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

- a. A current ACCSC [Outline for a Degree Program](#) for the Acupuncture and Herbal Medicine (MS) program;

- b. Justification as to how the reading/homework assignments listed in the syllabi for courses WS417 and WS504 aligns with the school’s estimation of out-of-class work/preparation; and
  - c. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
2. EWCNM must demonstrate that the school’s content and length of a distance education program or course of study are comparable to residential programs or that the school justifies and provides validation for any deviation from established clock-to-credit hour conversions (*Section IX (D)(2), Substantive Standards, Standards of Accreditation*). At the time of the visit, EWCNM was unable to provide documentation to show that the school has processes ensuring that courses delivered via distance education align with the approved credit hours. Upon interviews with educational administrative personnel, it appeared to the team the school had not revised the curriculum designed for residential delivery for a 100% online distance education didactic mode of instruction. Although the team noted that the school orients instructors on distance education delivery and maintains documentation of ongoing training, in interviews with instructors, the team also noted that there appeared to be a lack of awareness regarding program requirements for online learning environments.

In response to the team’s finding in this area, EWCNM stated that the school has reviewed and revised all distance education programs to ensure that content and length are comparable to residential programs. The school stated that in order to evaluate and justify credit hour assignments for distance education courses, the school created a “Time-on-task analysis,” sought validation from faculty regarding student engagement metrics, and compared benchmarks against other institutions. The school included a copy of its “Time-to-Task Analysis” for the Practice Management course. The Commission noted that while the analysis includes a breakdown of hours per week for the duration of the Practice Management Course and that the breakdown of hours for the course appears to conform to generally accepted practices, the school did not include a syllabus for the course as evidence that the school has implemented the changes. Specifically, the syllabi provided as examples for this section as well as the previous section, do not appear to follow the Time-to-Task Analysis that the school stated has been implemented across all programs.

Based on the foregoing, the Commission directs the school to provide the following:

- a. An implementation date as to when the school’s Time-to-Task Analysis was applied to all courses in the program;
  - b. The current syllabus for each course offered via distance education delivery to demonstrate that the school has implemented the changes; and
  - c. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
3. EWCNM must demonstrate that the Program Advisory Committees (“PAC”) for programs or courses of study that include content delivered via distance education includes at least one additional individual with experience in the delivery of distance education programs who is qualified to review and comment on the school’s distance education platform, methods, processes, procedures, and infrastructure in the context of the program/course content and objectives (*Section IX (D)(6), Substantive Standards, Standards of Accreditation*). At the time of the visit, EWCNM did not have a designated member of the PAC, who is external to the school, that provides a meaningful review of the school’s distance education.

In response, EWCNM provided a list of PAC members including qualifications and affiliations, minutes of all PAC meetings held since 2022, and the curriculum vitae of [REDACTED], the school's distance education PAC member. In review of the school's backup documentation provided, it appears that the school has both a Governing Oversight Committee and a Program Oversight Committee. [REDACTED] is listed on the school's November 15, 2024 Governing Oversight Committee minutes, in which the committee appeared to conduct a performance review of the school's President as well as the school's policy for program assessment. While the minutes reflect that distance education student survey results were presented, it appears that the review of the results was in the context of the President's evaluation. No further discussion with regard to distance education was noted in the minutes. Additionally, while the school's November 4, 2024 PAC meeting minutes reflect discussion with regard to distance education, [REDACTED] was not present for either meeting. Further, the school also provided minutes of Academic/Faculty meetings that reflect discussion of the school's distance education; however, there is nothing noted in the minutes about any distance education PAC member review or recommendations raising question as to [REDACTED] contribution as the identified distance education member of the school's PAC.

Specific to [REDACTED] qualifications to serve as the school's distance education PAC member, EWCNM stated in the response that [REDACTED] was appointed to the school's PAC prior to the school's implementation of distance education and that [REDACTED] is "... a recognized expert in online education and instructional design" and "brings extensive experience in developing and evaluating distance education platforms and curricula" (*Id.*, pg. 7). The Commission noted that while [REDACTED] has been a PAC member for a number of years, the PAC minutes provided lack evidence that [REDACTED] served in the role as the distance education representative. Further, while [REDACTED] Curriculum Vitae shows online and hybrid teaching experience since 2022, the Commission did not find any evidence to support the school's claims that this individual is a "recognized expert in online education and instructional design" or that this individual is qualified to review and comment on the school's education platform, methods, processes, procedures, and infrastructure in accordance with *Section IX (D), Substantive Standards, Standards of Accreditation*. The Commission noted that while years of experience teaching in an online modality can certainly contribute to the individual's knowledge of distance education, the question remains of how this experience qualifies the individual to review and comment on EWCNM's distance education program delivery methods and platform.

Further, the provided minutes of the November 4, 2024 PAC meeting raise questions with regard to the composition of the school's PAC. Specifically, only five individuals ([REDACTED]) were listed as being present for the November 4, 2024 meeting, all of whom appear to be either employed by EWCNM or a student/graduate of the school. Specifically, [REDACTED] comments on the importance of student feedback indicate how she struggled with distance learning in the beginning, insinuating that this individual is either a current or former student. ACCSC's *Standards* state that Program Advisory Committee's must include at least three members that represent the employment community and/or practitioners from the program area must be in attendance in or to be considered a Program Advisory Committee meeting (*Appendix III, Standards of Accreditation*). As such the Commission is interested in additional information with regard to school's PAC, not only in the area of distance education review but also in the general composition of the committee and its scheduled meetings.

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

- a. Evidence to support that [REDACTED] is qualified to review and comment on the school's distance education platform, methods, processes, procedures, and infrastructure in the context of the program content and objectives;

- b. A list of all individuals currently serving on the school’s Program Advisory Committee;
  - c. An explanation as to why the November 4, 2024 PAC meeting included individuals employed by the school and/or current/former students, and not members of the employment community.
  - d. Minutes of any PAC meeting conducted since December 2024;
  - e. A schedule of the school’s upcoming PAC meetings for 2025; and
  - f. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
4. EWCNM must demonstrate that the school’s programs and courses of study provide for timely and meaningful interaction between students and faculty, and among students (*Section IX (D)(4), Substantive Standards, Standards of Accreditation*) and must demonstrate that the school develops policies addressing teaching load (inclusive of residential and distance education), class size, time needed for course development, and the sharing of instructional responsibilities that allow for effective teaching in a distance education environment (*Section IX (G)(5), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the school’s online courses do not include synchronous sessions, online discussion posts, or other activities that foster meaningful interaction between students and instructors or amongst students. Additionally, the on-site evaluation team found that the school does not have policies in place to regulate teaching load for residential or distance education courses. Specifically, the school’s online courses appear to only include weekly recorded lectures or PowerPoint presentations with instructors assessing students’ understanding of the course content through multiple choice assessments. While students reported receiving timely responses from instructors and graded assessments, the school could not provide additional documentation to the on-site evaluation team demonstrating sustained interaction within the course curriculum.

In response to the December 11, 2024 OER, EWCNM stated that instructors meet with students weekly in an asynchronous format through scheduled office hours, one-on-one meetings, and small group discussions through the distance education platform. The school stated that student surveys “consistently indicate high levels of satisfaction with faculty responsiveness and availability” (*Id.*, p.9). EWCNM provided sample schedules outlining asynchronous interaction and office hours for two faculty members, [REDACTED] as well as results of a student survey. The Commission noted that while the sample schedule lists the daily availability of the two instructors, the school did not provide any further evidence that meaningful interaction takes place between faculty and students or amongst faculty, except when requested by the student.

In addition, although the student survey results provided in response to the December 11, 2024 OER appear positive, the school did not include any student comments or feedback from those students that were surveyed. The Commission did note, however, that the end-of-course student survey results provided as part of the school’s Continued Probation response include student comments and feedback that substantiate the on-site evaluation team’s finding regarding the lack of meaningful interaction between students and faculty teaching distance education courses. Multiple students commented that the course would be better if taught synchronously with live lectures or with a live Q&A instead of simply posting slides (*Id.*, pgs. 202-205). Examples of student comments included as part of the school’s response include:

- “Being on campus is the only thing that could have made this better”
- “I wish we had lectures for this class. I was actually very excited to take this class and it was disappointing how little time was put into this course”

- “More hands on practice”
- “[A] few less slides and more verbal lecture would be helpful”
- “Have an instructor actually teach instead of just posting PowerPoints, also having a textbook to reference. Had to watch YouTube videos to really teach myself the information”
- “More student/teacher discussion”
- “[T]his was an online course, a live video of class would be good for questions and answers while watching the class”
- “[T]his is an online class, a live version for questions and answers”
- “[A] live version of the class would be good for questions and answers”
- “[B]etter communication with the teacher”

Additionally, the November 4, 2024 PAC minutes include commentary from school staff suggesting that more interaction with faculty would be beneficial to students. Specifically, █████ mentioned that she is “concerned the students are just viewing power points and not watching the videos” and that [s]he thought google meet was better to make sure the students are getting the lectures” (*Id.*, pg. 212). █████ comments that it “... would be good to have the teacher available a few times during the semester to review and ask questions directly for instance before mid-term and finals” and to “[have] a few synchronous meetings with the teacher” (*Id.*). The minutes reflect that based on the feedback, █████ was going to schedule times for students to login via Zoom to ask questions, however, █████ was only responsible for the foundations courses and the introductory herb course. The minutes reflect that █████ teaches the majority of the herb courses and stated during the meeting, “...when students come to clinic they ask her questions about the herbs and she answers them (*Id.*)” While the Commission noted that █████ was available for questions during clinicals, there does not appear to be sufficient time built into the course itself to allow for meaningful interaction between faculty and students.

Further, in response to the on-site evaluation team’s finding with regard to policies addressing teaching load, EWCNM stated that the school developed a formal policy to address teaching load, course development, and the sharing of instructional responsibilities. Upon review of the school’s Teaching Load Policy, the Commission noted that while the policy appears to take into account faculty teaching load, the response does not address situations in which individuals hold both faculty and management/administrative positions. Specifically, █████ both hold full-time management/administrative positions as well as full-time faculty positions with the school, to include clinical supervision roles. Given the significant overarching concerns with management and administration’s capacity to operate a school coupled with concerns regarding teaching load and the lack of meaningful interaction between faculty and students, the Commission remains concerned with the workload of faculty.

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

- a. A narrative explanation on how the interaction between faculty and students in an online course is comparable to the interaction in a residential course;
- b. Any plans (syllabus, course schedule, etc.) for ongoing regular substantive interaction between students and faculty in a specific online course;
- c. A narrative explanation as to how the teaching load is appropriate and sustainable to serve students adequately and provide meaningful interaction;

- d. A breakdown of responsibilities for the management/administrative team that also serve as full time faculty and how those responsibilities allow for meaningful interaction with students; and
  - e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
5. EWCNM must demonstrate that the school's supervised laboratory or clinical setting is one where students engage in a discussion and/or the practical application of information is presented (e.g. practical application settings, clinical settings, etc.) under the supervision of a qualified school faculty member (*Appendix III, Standards of Accreditation*). The on-site evaluation team noted that it was unclear whether the offsite clinical experience is a supervised laboratory setting under the direct supervision of a school faculty member or an externship site. In response to the December 11, 2024 OER, EWCNM stated that the school does not offer clinical lab at off-site locations and that the school only had externships located in downtown Sarasota which were discontinued in November 2024. EWCNM stated that one faculty member operates a clinic, the [REDACTED], [REDACTED], and supervises students during their externship. EWCNM also provided a copy of the school's policies and procedures for supervised clinical hours, a copy of the syllabus outlining the requirements of the externship, and a description of how the offsite training is comparable to the onsite laboratory/clinical training.

In reviewing the school's response, the Commission noted that although page 7 of the school's Policies and Procedures for Supervised Clinical Hours states that students will be "under 100% direct supervision by a supervisor," earlier in the policy, the school states the "[s]upervised clinical hours must be conducted under the supervision of a licensed acupuncture practitioner, Nahual Medicine specialist, **or** [emphasis added] faculty member with sufficient training and experience" (*Id.*, pg. 401). The school's policy implies that direct supervision can occur with other professionals other than school faculty, which would constitute the students experience as an externship rather than a supervised lab or clinical experience.

Regarding the off-site clinic that the school stated is operated by a faculty member, the Commission is interested in additional information regarding the clinic and the supervision of students. Specifically, EWCNM stated in the January 22, 2025 response that the school does not offer a clinical lab off-site; however, the school then provided information on a clinical location that a faculty member operates and where students can conduct their externship. As such, the Commission is interested in additional information regarding the location of the clinic, the extent of the faculty supervision, and the capacity of the faculty member to operate the clinic and supervise students simultaneously.

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

- a. The school's written policies and procedures for supervised laboratory/clinical hours, with an explanation regarding any changes or updates that have been made since the school's last response;
- b. A narrative explanation of the school's policy regarding clinical supervision by a "a licensed acupuncture practitioner, Nahual Medicine specialist, **or** [emphasis added] faculty member with sufficient training and experience;"
- c. A list of all faculty members that supervise students' clinical experience;
- d. A description of how students are directly supervised at the offsite clinic, to include student to faculty ratio, number of patients at the site at once, and the capacity of the faculty member to adequately supervise the students while operating the clinic; and

- e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

### **Status of ACAHM Programmatic Accreditation**

Subsequent to the Commission's February 2025 meeting ACCSC was made aware of an action taken by the Accreditation Commission for Acupuncture and Herbal Medicine or "ACAHM" to **terminate the accreditation** of EWCNM's Master of Acupuncture with a Chinese herbal medicine specialization program effective February 12, 2025. The March 12, 2025 letter from ACAHM outlines twenty-eight (28) areas of non-compliance and an addition fifteen (15) areas of compliance requiring further development. ACCSC's *Rules* state that the Commission will review and take appropriate action regarding the accreditation status of any school for which the Commission has received an action by an accrediting agency to suspend, deny, or withdraw/revoke accreditation (*Section VII (5)(c)(i), Rules of Process and Procedure, Standards of Accreditation*). Based on the foregoing, EWCNM is directed to provide the following:

- a. An update as to the school's accreditation status with the Accrediting Commission for Acupuncture and Herbal Medicine ("ACAHM");
- b. An indication as to whether the school intends to appeal ACAHM's adverse accreditation decision to include documentation of the school's intent to appeal and timeline for appeal, if applicable; and
- c. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

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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 May 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 May 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>6</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.

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<sup>6</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).

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 April 23, 2025**. 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 April 23, 2025** the Commission will consider further appropriate action.

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

[REDACTED]

Michale S. McComis, Ed.D.  
Executive Director

e: [REDACTED]