

Year Three Peer-Evaluation Report

National College of Natural Medicine

Portland, Oregon

April 22-24, 2014

A confidential report of findings prepared for the  
Northwest Commission on Colleges and Universities

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## **I. Evaluators**

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## II. Introduction

The National College of Natural Medicine (NCNM) is a private, nonprofit, independent 501(c)(3) Oregon educational corporation located in Portland, Oregon. Established in 1956 under the name National College of Naturopathic Medicine, NCNM is the oldest programmatically accredited naturopathic medical educational institution in North America. NCNM underwent a name change in 2006 to the National College of Natural Medicine.

The College was granted candidacy in 2000. Initial accreditation was granted in June 2005, effective September 1, 2004. Accreditation was reaffirmed in August 2007, in July 2010, and in August 2011.

NCNM offers graduate degrees and certificates through the three schools. The School of Naturopathic Medicine offers the Doctor of Naturopathic Medicine degree. The School of Classical Chinese Medicine offers the Master of Science in Oriental Medicine (MSOM) and the Master of Acupuncture (MAc). Entry into the latter program has been temporarily suspended while the School of CCM pursues the process of developing a first professional doctoral program accredited by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM). The School of Research & Graduate Studies offers the Master of Science in Integrative Medicine Research (MSiMR) and the Master of Science in Nutrition (MScN). The MScN is available to currently enrolled students and will begin to admit new students in summer 2014.

NCNM is located south of the main Portland down town area. It has easy access by car and public transportation, which is the preferred method by most students, faculty and staff. The college has 320 employees, which include models used for classes, subs in clinic, on call people, etc., and 550 students (spring enrollment). Enrollment in fall 2013 was 562 students.

The majority of the college's activities reside in four buildings. The college owns three of the buildings, the Administrative Building, the Academic Building, and the Helfgott Research and Community Education Building. NCNM has a purchase agreement with the fourth property, the Clinic and adjacent Service Building. The Service Building provides office space for the Facilities Department, the Community Clinic Department, the community clinic medicinary, chief of security, dean of clinic operations, and has storage. The Helfgott Research Institute and Community Education Center is the primary teaching and lab space for the MSiMR and the MScN program. The college also owns three other small properties.

NCNM is governed by a board of directors. The board hires and delegates the day-to-day operations of the college to the president. Four vice-presidents and a director report to the president and provide an effective system of leadership for the college.

### **III. Assessment of the Self-Evaluation Report and support materials**

An Evaluation Committee of four members from peer institutions representing the NWCCU performed a virtual site visit of the National College of Natural Medicine from April 22-24, 2014 to conduct a Year Three Evaluation that included recommendations for Standard One and Standard Two. Prior to the virtual visit, Committee members reviewed the college's 2014 Year Three Self-Evaluation Report and additional information from their Intranet, dropbox, website and other electronic documents.

The Year Three self-evaluation report was structured in the following sections: Institutional Overview, Preface, Updated Chapter One, Executive Summary of ERs 2 and 3, Response to Recommendations #1 and #2, Core Themes, Chapter Two, Conclusion, Institutional Data Form, and Report Contributors. Overall, the Evaluation Committee found the self-study report and reporting materials to be accurate and useful in its assessment of the college. It was comprehensive in addressing Standard One Recommendations and Standard Two. Most of the materials were available electronically and the ALO promptly responded to all requests for additional information.

Interviews were conducted virtually via teleconferences, using telephone numbers provided by NWCCU. The Evaluation Committee met with board members, the president, members of the executive team, faculty representatives, student representatives, and various other members of the college team (See Appendix A: List of Individuals Interviewed). The Committee extends a warm appreciation to members of the NCNM community for their candid responses, eagerness to assist, and overall assistance.

## IV. Response to the Year One Peer-Evaluation's Recommendations, 1 and 2 Mission and Core Themes

Standard One—Mission, Core Themes, and Expectations

### 1.A Mission

A recommendation from the 2011 Year One Peer Evaluation Committee Report stated:

**Recommendation 1: The institution should review the appropriateness of its indicators for the fulfillment of its educational mission, identify indicators that individually manifest the essential element of its mission and collectively encompass the mission. Standard [1.A.2]**

1.A.1 & 1.A.2. The current revised mission statement, “To educate and train physicians, practitioners, and pre-professionals in the art, science, and research of natural medicine” is clear, concise, focused and the result of an open and collaborative process involving key campus stakeholders. The mission was approved by the board of directors in July 2011. The revised mission statement reflects NCNM’s expansion into research activities (School of Research and Graduate studies and the addition of the Master of Science in Integrative Medicine Research), movement toward a BS degree completion program, and goal toward becoming a university. The revised mission statement incorporated the concepts of “pre-professionals” and “research.” It is a natural flow from NCNM’s purpose and vision statement. The provost report to the board of directors, dated May 27, 2011 validated community involvement in the revision of the mission, and was communicated to the NCNM community through the faculty senate, staff council, and student government representatives.

### 1.B. Core Themes

1.B.1 & 1.B.2. Based on Recommendation 2 from the 2011 Year One Peer Evaluation Committee Report, revisions were made to the mission statement and its corresponding core themes. The recommendation from the report stated:

**Recommendation 2: The institution should identify core themes that are essential elements of its educational mission. For each core theme, a reasonable number of focused objectives should be established and meaningful, assessable and verifiable indicators of achievement should be articulate. Standards [1.B.1 & 1.B.2]**

The Alignment Model was implemented as the foundation to guide decision-making and consistency throughout the College. The revised core themes adequately interpret the mission statement of the college and are clearly stated to reflect and be consistent with NCNM’s educational mission. The three core themes are:

Student Success  
Teaching and Learning  
Professional Vitality

Indicators selected by NCM indicate fulfillment of its educational mission. The themes and objectives presented below were directly derived from the mission statement of the institution:

| Core Theme  | Objective   | Indicators   |
|---|---|--|
| Core Theme 1: Student Success—support successful learning   | Objective: Ensure that the standards for admission result in matriculation and retention of students who are academically and non-academically prepared for the rigors of medical school. | Indicator: Accepted applicants meet or exceed seven targeted non-cognitive admission criteria              |
|   |   | Accepted applicants meet or exceed targeted GPA standards for admission                                    |
|   | Objective: Foster systems that support student success  | Student satisfaction with targeted support services meets or exceeds specified thresholds.                 |
|   |   | Student attrition data each year is 5% or less [CR MSN]  |
| Core Theme 2: Teaching and Learning—deliver education that assures student achievement of competencies within the art and science of natural medicine practice and research | Objective: Improve faculty teaching by offering information, resources, and seminars to faculty   | Faculty report an average score of 4 or higher (Likert scale 1-5) on identified post-seminar surveys.      |
|   | Objective: deliver outcomes based curricula that ensure that all graduates achieve the minimum competency standards   | Indicator for student achievement: pass rates, clinical entrance and exit exams; board pass rates [CR MSN] |
|   | Objective: Ensure the curricula retain  | Mean responses for specifically targeted   |

|  |  |   |
|--|--|---|
|  | the classical roots of their medicines   | questions in annual exit surveys [CR MSN]   |
| Core Theme 3: Professional Vitality—promote the success of our graduates through our academic, clinical, and research endeavors. | Objective: Prepare and support our graduates to work within the professions for which they are trained   | Alumni placement data-92% of respondents [CR MSN]   |
|  |  | Alumni perception of preparation for role [CR MSN]  |
|  |  | Continuing Education Offering-participation in offerings & increasing online CEUs   |
|  | Objective: prepare students to engage in scholarly interaction with other professionals & support the free exchange of ideas, respectful debate, & other exercises of intellectual curiosity | Advance the exposure to scholarly research and EBP (80% student proficiency in use of online databases, reading literature, interpreting study findings |
|  |  | Student design and conduct research-MSIMR and NCNM students   |
|  |  | Community members are encouraged to engage in the free exchange of ideas, respectful debate, and other exercises—through forum                          |

[CR MSN]=Cross reference the mission

Data are collected for each indicator. The collection of data to support indicators was presented and discussed.

The core themes were included in the February 22, 2013 provost report to the board of directors. However, in meetings with various individuals, with the exception of the SGA representatives, knowledge of the core themes was not clearly evident.

## V. Eligibility Requirements (as appropriate to the scope of the evaluation)

**1. Operational Status.** NCNM was established in 1956 and has awarded 2304 degrees, with some graduates receiving more than one degree.

**2. Authority.** NCNM possesses the authority to grant first professional graduate degrees and is a recognized educational institution under the laws of the State of Oregon. NCNM's academic programs are accredited with the appropriate programmatic accreditation recognized by the United States Department of Education.

**3. Mission and Core Themes.** The institution's mission and core themes are clearly defined, broad based, consistent with its legal authorization, and are appropriate to a degree-granting institution of higher education. The institution's purpose is to serve the educational interests of its students and its principal programs lead to recognized degrees. The institution devotes all, or substantially all, of its resources to support its educational mission and core themes. The current mission was approved by the board of directors in July, 2011. The core themes were clearly derived from the mission and revised with the mission.

**4. Operational Focus and Independence.** The college operates under a governance structure that is consistent with private, nonprofit 501(c)(3), independent educational institutions. The college has organizational and operational independence to be held accountable to meet NWCCU standards and eligibility requirements.

**5. Non-Discrimination.** The institution is governed and administered with respect for the individual in a nondiscriminatory manner while responding to the educational needs and legitimate claims of the constituencies it serves as determined by its charter, its mission, and its core themes.

**6. Institutional Integrity.** The institution adheres to ethical standards in its operations and relationships.

**7. Governing Board.** NCNM has a 10-member volunteer board of directors. The board is legally constituted to hold the property, assets and purposes of the institution in trust, and to exercise ultimate control over NCNM's affairs and ensure financial stability.

**8. Chief Executive Officer.** Dr. David Schleich has been serving as the full time president for NCNM since 2007.

**9. Administration.** NCNM employs a sufficient number of qualified administrative, academic, and student service administrators to provide the oversight, leadership and management required to operate the College. The senior executive team has clear oversight over their individual units.

**10. Faculty.** NCNM employs sufficient full time faculty and an appropriate number of part-time faculty who are well qualified to achieve its educational objectives, establish and oversee academic policies, and ensure the integrity and continuity of its academic programs.

**11. Educational Program.** The institution provides graduate degree programs which include appropriate content and rigor consistent with its mission and core themes.

**13. Library and Information Resources.** The College maintains and provides proper access to library and information resources with an appropriate level of currency, depth, and breadth to support NCNM's academic programs and services.

**14. Physical and Technological Infrastructure.** The College's classrooms, laboratory, Library and other areas are adequately equipped with the appropriate technology and equipment to support desired educational outcomes.

**15. Academic Freedom.** NCNM maintains a culture of academic freedom; however, the board of directors is charged with formal approval of an academic freedom policy and no evidence of such approval was apparent.

**16. Admissions.** Admissions criteria, policies, and procedures are clearly disseminated on the College's website and in other publications. Student admission procedures and practices are adhered to by administration, faculty, and staff.

**17. Public Information.** NCNM publishes accurate, current, and consistent information in all forms of print and digital media available to internal and external constituencies. The College publishes in its academic catalog and on the website current and accurate information regarding its mission and core themes; admission requirements and procedures; grading policy; information on academic programs and courses; names, titles and academic credentials of administrators and faculty; rules and regulations for student conduct ; rights and responsibilities of students; tuition, fees, and other program costs; refund policies and procedures; opportunities and requirements for financial aid; and the academic calendar.

**18. Financial Resources.** The institution operates on a balanced budget and provides positive cash flow. Financial budgeting reflects realistic financial assumptions.

**19. Financial Accountability.** The college receives an annual audit and shares the results with the board. Findings are addressed in a timely manner.

**20. Disclosure.** NCNM is committed to the accurate disclosure of all information the Commission has requested prior to, during, and after the evaluation visit that is required to carry out accreditation functions.

**21. Relationship with the Accreditation Commission.** As evident in its interaction with various evaluation team members and staff, and timely completion of NWCCU required forms and progress reports, NCNM accepts the standards and related policies of the Commission and agrees to comply with these standards and policies as currently stated or modified. Further, the College acknowledges that the Commission may within its own rules and policies make disclosures about NCNM's accreditation status to members of the public.

**22. Student Achievement.** Student learning outcomes for NCNM's degree programs are defined and published in the academic catalog and on its website. The faculty engaged in regular and ongoing assessment to validate achievement of student learning outcomes. Academic outcome data are reported, analyzed, and used for program improvement.

**23. Institutional Effectiveness.** NCNM utilizes systematic evaluation and planning procedures as evident in the publication, *A Framework for Action, 2012-2017*. Its mission and core themes are central to these plans, and there is evidence that analysis and assessment have been reported to most campus constituencies.

**24. Scale and Sustainability.** NCNM has operated as an independent naturopathic medical educational institution since 1956 and its current operational scale (e.g., enrollment, human and financial resources and institutional infrastructure) appears appropriate to fulfill its mission and achieve its core themes.

## VI. Mission, Core Themes, and Expectations

### Standard 1.A. Mission

1.A.1 & 1.A.2. The current revised mission statement, “To educate and train physicians, practitioners, and pre-professionals in the art, science, and research of natural medicine” is clear, concise, focused and the result of an open and collaborative process involving key campus stakeholders. The mission was approved by the board of directors in July 2011. The revised mission statement reflects NCNM’s expansion into research activities (School of Research and Graduate studies and the addition of the Master of Science in Integrative Medicine Research), movement toward a BS degree completion program, and goal toward becoming a university.

### Standard 1.B. Core Themes

1.B.1 & 1.B.2. The revised core themes adequately interpret the mission statement of the college and are clearly stated to reflect and be consistent with NCNM’s educational mission. The three core themes are:

Student Success  
Teaching and Learning  
Professional Vitality

#### **Core Theme 1: Student Success**—support successful learning

Objective: Ensure that the standards for admission result in matriculation and retention of students who are academically and non-academically prepared for the rigors of medical school.

Objective: Foster systems that support student success

#### **Core Theme 2: Teaching and Learning**—deliver education that assures student achievement of competencies within the art and science of natural medicine practice and research

Objective: Improve faculty teaching by offering information, resources, and seminars to faculty

Objective: Deliver outcomes based curricula that ensure that all graduates achieve the minimum competency standards

Objective: Ensure the curricula retain the classical roots of their medicines

#### **Core Theme 3: Professional Vitality**—promote the success of our graduates through our academic, clinical, and research endeavors.

Objective: Prepare and support our graduates to work within the professions for which they are trained.

Objective: Prepare students to engage in scholarly interaction with other professionals & support the free exchange of ideas, respectful debate, & other exercises of intellectual curiosity

The collection of data associated with the identified indicators is comprehensive and appropriate to the objectives.

## **VII. Resources and Capacity**

### **Standard 2.A. Governance**

2.A.1 National College of Natural Medicine (NCNM) is a non-profit 501(c)(3) corporation organized under the laws of the State of Oregon and is governed by the board of directors. The system of governance is widely understood, with clearly defined authority, roles, and responsibilities. The organizational chart/structure is located on the Intranet, in the college catalog, and student handbook, with names and titles provided.

The board of directors hires and evaluates a chief executive officer (President) who is held accountable for the organizational performance and for meeting the defined expectation of the board. Four vice-presidents and a director report to the president. These executive level administrators are responsible for governing their respective teams.

Participation in the decision-making structures and processes of NCNM is provided through various avenues, such as the faculty senate, student governance association, college planning board, and staff council. Minutes from these bodies and/or the provost report to the board validated the active participation of students, staff, administrators, and faculty in college governance that impacts their interest. Two members of the student body are elected to serve as non-voting members of the board of directors. Their specific responsibilities are outlined in NCNM Policy and Procedure governing student representation (BA.2.20), approved on June 24, 2011. The board also includes a representative from faculty senate and one from staff council, both non-voting.

The publication, A Framework for Action depicts the NCNM Communications Model (2012-2017) that illustrates the interrelationship between and among the various college committees and stakeholders. A brief written synopsis of the role of each is provided in this document.

2.A.2 Not applicable (multi-unit governance system)

2.A.3 Personnel in the Office of Institutional Research obtain and track data for strategic planning, institutional assessment, develop surveys (e.g. student satisfaction, exit, cultural climate), compile data, and monitor compliance with accreditation standards. They are

members of the program and curriculum review committee and the provost planning council and thus are well integrated into the organizational and programmatic standards for accreditation.

The Director of Institutional Research and Compliance is the accreditation liaison officer (ALO) who is responsible for accreditation annual reports and coordinating with other academic units to ensure completion of their self-study reports and site visits. The ALO ensures compliance with external mandates such as programmatic accreditation standards. For example, the College meets the external mandates for the state of New Mexico and California Board of Acupuncture to ensure their graduates meet the eligibility requirements to take the licensure examination in these states. Likewise, they provide evidence of CNME accreditation to meet the regulatory requirements of Washington State. NCNM does not engage in collective bargaining agreements and as a private non-profit organization does not report to the legislative bodies.

### Governing Board

2.A.4 NCNM is governed by a board of directors whose members serve three-year terms and represent the general community. The bylaws identify the qualifications for composition of the board. Specifically, one director should be a graduate of the college, one-third plus one shall have ND degrees to satisfy regulatory requirements for the State of Washington, one shall have an Oriental medicine degree, and the remaining chosen from the public at large. The board holds the final authority for approval of policy and budget and budgetary matters affecting the college. The board oversees the organization and delegates leadership and management authority to the president.

The bylaws indicate that the board of directors shall consist of a minimum of nine and a maximum of seventeen voting directors. Currently, there are 10 members on the board. The board meets at least three times a year (February, June-Retreat, November). The policy and procedure for the *Responsibilities of the Governing (Executive) Board of Directors*, approved on June 24, 2011, indicates that the board “has a minimum of nine voting members, at least two thirds of whom have no contractual employment or personal interest in the college.” The Conflict of Interest policy of the NCNM board members (BA.2.2, dated June 24, 2011) prohibits board members who are employees of the college from voting on compensation and employment related matters and members who provide goods and services to NCNM cannot vote on contractual agreements pertaining to those goods and services.

2.A.5 A review of the NCNM bylaws and policy and procedure (BA 2.7) and interviews with the board of directors, board chair and president validated that the board acts only as a committee of the whole and that no member or subcommittee of the board acts on behalf of the board, unless by formal delegation of the full board of directors. Standing committees of the board include: Executive, Finance and Administrative Affairs, Strategic Pathway, Academic Affairs, Board Development, Compensation, and Ad hoc. Interviews with board members support that the committees meet regularly.

2.A.6 Interviews with the board members and review of board of director minutes show that the board establishes, reviews regularly, revises as necessary and exercises broad oversight of institutional policies, including those regarding its own organization and operation. NCNM Policy and Procedure (BA 2.7) directs that the board establish and regularly review basic institutional policies. A review of the minutes from various board meetings identifies the presentation of reports from the board committees, faculty senate, staff council and student government association as standing items. The minutes also reflected items that required board action related to institutional policies, budget approval, advancement and operations.

2.A.7 The board selects and evaluates a chief executive officer (President) who is delegated the ultimate authority and responsibility for all aspects of the day-to-day operations and activities of the College. The president works under the general supervision of the board and is also responsible for fundraising and external relations and for the fulfillment of specific yearly or multi-year goals (KPIs) determined by the board (bylaws). The current president (Dr. Schleich) was appointed by the board of directors in 2007.

2.A.8 The board development committee ensures the ongoing generation of a recruitment pool of board members and provides for the orientation and development of qualified candidates.

The board of directors evaluates its performance through surveys every two to four years. Board members (8) completed surveys in May/June 2012 responding to Likert scale (1-10) items under governance, board management, financial, and self-assessment. Results were used to provide training in the areas of board member responsibilities and not-for-profit roles and responsibilities. For example, the minutes from the February 2013 board development committee show the dissemination and discussion of a handout on *10 Responsibilities of a Nonprofit Board*. There was also a discussion on board members joining the National Association of Corporate Directors. Other minutes reflect an emphasis on ensuring the appropriate number and qualifications of board members and providing a comprehensive orientation and training.

Eight board members completed a survey in January 2014. Results of survey data reveal improvements in areas that were 5 or 6 on a 1-10 Likert scale in the 2012 survey (e.g. legal responsibility, roles and responsibility, orientation). The 2014 results revealed increases over 2012 in the majority of areas. The two areas that showed a notable decline from 2012 were, “formal long-range strategic planning is conducted every 3-5 years involving board and staff” and “board reviews the institution’s projected 3-year financial plan annually.” Interviews with board members and the president confirmed that these results will be reviewed by the board development committee, with actions as appropriate.

## Leadership and Management

2.A.9 NCNM has an effective system of leadership, staffed by qualified administrators for the size of the college. The senior leadership teams have clear oversight of individual functional units, as shown in the organizational chart. The VP of finance & administration/CFO, VP of advancement, VP of marketing & communications, VP of academic affairs/provost, and director of campus development report directly to the president. Each of these executive level administrators has a well-defined management team to accomplish the goals of his/her respective unit. The director of campus development also reports to the president, but does not have a specific team. He works collaboratively with various administrators as appropriate.

2.A.10 NCNM has a qualified chief executive officer (President) who was appointed in 2007. He has an extensive background in higher education with progressive leadership experiences, including vice-president academic of Niagara College, president of Truestar Health, and president of the Canadian College of Naturopathic Medicine. Dr. David Schleich has been delegated full accountability and responsibility for the day-to-day operations of NCNM. He is an ex-officio non-voting member of the board of directors.

2.A.11 NCNM employs a sufficient number of qualified administrators to provide effective leadership and management for the institution's major support and operational functions.

The college planning team (CPT) is the senior management team of the college. It is chaired by the president and includes the four vice presidents. CPT is charged with communicating with each other about the status and progress of initiatives within their areas and working together to ensure fulfillment of the college's mission, core themes, KPIs, and strategic plan. As depicted in the organizational chart, each VP has areas and personnel to accomplish his or her identified goals. For example, the VP for academic affairs/provost has a provost planning council composed of deans, associate deans and directors to ensure the stable progression of the academic arena. The council meets with other units/departments in a collaborative manner, such as the registrar and chief medical officer.

The NCNM Communications Model is an exemplar of working collaboratively across disciplines, institutional functions and units to foster fulfillment of the institution's mission and accomplishment of its core themes. The model depicts three clusters: 1) NCNM board of directors and its committees, 2) councils, and 3) teams. All members of teams, councils and committees can add an agenda item to an upcoming meeting, respond to any agenda item or item in previous minutes, send an agenda item to another committee, council or team through his group's chair, and review any applicable budget line or policy related to an agenda item. This structure empowers everyone to have involvement in the institution's outcomes. The outcome, as evident in various interviews, is involvement, ownership and good-will within the academic community.

## Policies and Procedures

### *Academics*

2.A.12 Academic Policies. Policies related to teaching, service, scholarship, research and artistic creation are clearly articulated in adequate detail in the faculty handbook which can be accessed via the NCNM Intranet. Policies specifically related to students are detailed in the college catalog and student handbook, also found on the Intranet. These policies are clearly communicated during orientation and in various meetings.

2.A.13 Policies related to access and use of library and information resources are readily available on the Intranet and also on the library's web page in the FAQ section. Discussion with the director of library services and the deans corroborated the self-evaluation report that policies on behavior, noise, security and fines are enforced routinely and are effective in maintaining an environment conducive to learning and studying. Review of student satisfaction surveys revealed no concerns related to these issues.

2.A.14 The institution's transfer of credit policy is clearly stated in the college catalog on page 15. To ensure substantial course equivalency and currency of material of the transfer course, specific academic administrators and/or faculty conduct an appropriate review of the course content.

### *Students*

2.A.15. The College has adequate policies, procedures, student rights and responsibilities for students that are delineated in the student handbook and covered at the orientation programs at the Portland campus. New students are provided information during New Student Orientation regarding academic policies, accommodations for ADA compliance, and receive an updated copy of the handbook. The New Student Orientation is a required course that provides students with the opportunity to learn the rights, responsibilities and expectations of being a student at NCNM.

The administration of College policies is clear and consistent with a clearly defined appeals process for all academic programs. Interviews conducted by the evaluation committee of faculty and staff verified that policies and procedures were being adhered to and followed consistently.

2.A.16. Admissions and placement policies were reviewed, including the appeals and readmission policies and found that they are defined and administered in a consistent and fair manner.

For admission into NCNM, students need to possess the following general qualities: critical thinking; sound judgment; emotional stability and maturity; empathy; physical and mental stamina; and the ability to learn and function in a wide variety of educational settings. These qualities are reviewed to determine the probability of student

success and are documented on admissions interview forms that provide qualitative comments as well as a quantifiable-raw score. The admissions interview process is very robust for the Doctorate of Naturopathic Medicine and Classical Chinese Medicine programs. Graduates of NCNM must have the knowledge and skills to function in a broad variety of clinical situations and render a wide spectrum of patient care and research participant interaction.

Additionally, admission criteria are clearly outlined in the print and website versions of the catalog that includes an admissions application and all necessary application materials, including pre-requisites for all the programs. NCNM's policies regarding its appeals and readmission process are clearly defined and administered in a fair and consistent manner.

2.A.17. The College has well-defined policies and procedures for student organizations and clubs seeking approval from the College as outlined in the student handbook. The NCNM Student Government Association (SGA) oversees the management and distribution of student activity fees collected each quarter with registration. Co-curricular activities and roles are clearly communicated and any needs that surface for students are addressed by SGA in order to enhance the student experience at NCNM. All members of the student body are invited to attend and participate in SGA meetings.

As stated in the student handbook, students are responsible for reading and understanding all policies and information listed in the current student handbook. The current student handbook is online at [www.ncnm.edu](http://www.ncnm.edu). Paper copies are available in the Office of Student Life.

### *Human Resources*

Human resource functions are centralized under the human resource generalist, who has ten years of career human resource experience and two years with the college. The human resource generalist reports directly to the CFO.

2.A.18 The NCNM's employee handbook is revised at least every three years by the Human Resources Department in conjunction with the CFO. It is reviewed by outside legal counsel to ensure compliance with all applicable laws. Policies related to faculty are reviewed every other year. All employees within an employee group, such as full-time, part-time, adjunct, etc. have consistent benefits.

2.A.19 All employees sign a copy of their work description when they are hired or promoted and sign again if their job description changes. The Employee Rights section of the employee handbook contains conditions of employment, rights and responsibilities, and criteria and procedures for evaluation, retention, promotion, and termination. These rights are clearly presented and easy to comprehend and understand.

2.A.20 All employee information is maintained in a locked fire proof filing cabinet in a locked Human Resources office. The Human Resources office lock is not a part of the

master key system and only the human resource generalist and payroll specialist have access to the key. Confidential records that are stored online are secured by user name and password.

### *Institutional Integrity*

2.A.21 The institution represents itself clearly, accurately and consistently in its announcements, statements and publications. A system of checks and balances exists to ensure that errors are identified prior to publication, posting, or announcements. A review of the website shows that information about its academic programs, time frames for program completion, credits, and hours are posted. The website presents current news, events and numerous links to additional information. Interviews validated that projects and documents for the website, Intranet, or dissemination are organized based on deadlines, which drives the review process and also the mission and core themes. A member from the Marketing & Communications department will contact the unit heads to identify information that should be removed from the website, updates to the website, key features, and new items. The draft version is submitted to the provider for review prior to sending to the graphic designer for layout. The item is reviewed again prior to publication.

2.A.22 The institution advocates, subscribes to, and exemplifies high ethical standards in managing and operating the institution, including its dealings with the public, the commission, and external organizations, and in the fair and equitable treatment of students, faculty, administration, staff, and other constituencies. It ensures complaints and grievances are addressed in a fair and timely manner.

NCNM's values are respect, integrity, creativity/innovation, commitment and excellence. Interviews with various constituencies validate that these values transcend the policies and procedures and relationships at the college and that administrators, staff, faculty and students are treated ethically.

The faculty and employee handbooks are available on the Intranet and students can access their handbook from the NCNM website. Section 3.15 (pg. 19) of the employee handbook discusses grievances, informal procedures, formal procedures and possible outcomes. Section 15 in the student handbook discusses the student grievance policy, informal process, formal process, appeal process and provides contact information on accreditation agencies, Oregon Department of Justice, and the U.S. Department of Education—Office for Civil Rights for students who believe that NCNM has not adhered to its policies. The faculty grievance policy is located on page 36 in the faculty handbook and provides a general overview and grievance process and procedures. These handbooks outline that grievances and complaints are handled in a prompt, fair, and equitable manner.

2.A.23 The institution adheres to a clearly defined policy that prohibits conflict of interest on the part of the governing board, administration, faculty and staff. Board members sign a conflict of interest policy annually. Guidelines related to conflicts of interest are found

in the faculty handbook (professional ethics and conflict of interest; managing financial conflicts of interest in research) and in the employee handbook (Section 3.11, conflict of interest).

2.A.24 The policies and guidelines on ownership, copyright, control, compensation, and revenue derived from the creation and production of intellectual property are clearly defined in the employee and student handbooks. Section 12.11 in the student handbook outlines the policy for intellectual property and copyrights. The policy on copyright ownership policy that governs faculty is located in the faculty rights and responsibility section of the faculty handbook (pg. 41).

2.A.25 NCNM publishes its accurate accreditation status in the student college handbook, in the faculty handbook, in the course catalog and has a link to information on accreditation on its website. The website link provides the address and contact information for the Northwest Commission on Colleges and Universities, Accreditation Commission for Acupuncture and Oriental Medicine, and Council on Naturopathic Medical Education.

2.A.26 NCNM has contractual agreements with external entities to ensure the comprehensive clinical education of its students. These agreements, as well as others, adhere to institutional policies and standards for accreditation.

#### *Academic Freedom*

2.A.27 The institution publishes and adheres to policies, approved by its governing board, regarding academic freedom and responsibility that protect its constituencies from inappropriate internal and external influences, pressures and harassment. The institution's academic freedom policy is a clear, brief statement declaring that "*NCNM faculty and students are free to question, discover, and test all knowledge appropriate to their discipline as judged by the academic community in general.*" This statement is found in both the faculty and student handbooks. In addition there are clearly described policies related to faculty responsibilities regarding copyright law, intellectual property issues, selection of textbooks, plagiarism, conflict of interest and other issues in the faculty handbook on pages 41-60.

There is no direct evidence that the board approved this policy. The provost recalls that the policy was developed under the direction of Dr. Jim Miller, president of the College in the late eighties and early nineties.

2.A.28 The institution's academic freedom policy, two of its stated values (creativity and innovation) and Core Theme III: Professional Vitality, all provide clarity and definition that frame the intention of NCNM to promote an environment that supports independent thought in the pursuit and dissemination of knowledge. Examples cited during discussions with faculty and academic administrators provided ample evidence of such an environment. Faculty are not only encouraged, but expected to hold and teach their views. The dean of the School of Classical Chinese Medicine reports that faculty

members are encouraged to teach from their own unique Chinese medicine lineage, of which there are many. The dean of the School of Research and Graduate Studies reports that both students and faculty are encouraged to constantly test their opinions and theories. All deans report that curricula and course content in their programs are created by faculty, guided by program and course outcomes, without undue influence from either internal or external influences. Faculty Senate representatives stated that, to their knowledge, there had never been a concern brought forward by a faculty member regarding academic freedom.

2.A.29 Policies that describe the expectation of fair, accurate and objective presentation of material by faculty are included in the faculty handbook. A review of several course syllabi from each of the programs offered at NCNM demonstrate appropriate coverage of current and generally accepted material from the relevant discipline. Required and recommended texts and other reading material are appropriate in breadth and depth for the various programs and are appropriately sourced.

### *Finance*

2.A.30 The College has clearly defined financial policies that have been approved by the board. These can be found in *A Framework for Action* and on the Intranet. The CFO produces monthly financial reports, which are distributed to the board and discussed with members of the board's finance committee, as well as the full board at their November, February and June-retreat meetings. The vice president of advancement provides reports and meets with the Board in November, February and June.

Financial aid, accounting and fund raising controls and procedures are audited annually by Hoffman, Stewart & Schmidt, P.C. The audit report is given to the board's finance committee and is shared with the full board. Operating and capital budget processes, approval and oversight are discussed in section 2.F.2, 2.F.3 and 2.F.5. All debt is preapproved by the board.

### Commendations:

- The Evaluation Committee commends the College community for creating a culture of respect and valuing of other ideas, suggestions and opinions. [2.A.1]
- The Evaluation Committee commends the College for its Communication Model that ensures integration and interconnections between and among the numerous units and support areas.[2.A.11]

### Recommendation:

- The Evaluation Committee recommends that the board of directors formally approve the institution's academic freedom policy. [A.2.27]

## **Standard 2.B Human Resources**

2.B.1 The College employs a sufficient number of qualified personnel to meet the Human Resource needs of the College. The Human Resources department, in conjunction with the CFO and other departments, has put in place and maintains procedures to track and standardize hiring processes. Job descriptions are listed on the College's Intranet. They are reviewed by appropriate personnel and are revised as needed to accurately reflect duties, responsibilities, and qualifications for positions. The Human Resources department oversees the process for background and criminal history checks.

2.B.2 NCNM uses a standardized evaluation process and has recently moved to a common November review date for its staff and administrators. New employees receive a 90 day evaluation and annually thereafter. The supervisor's evaluation tool, the individual's goals, and performance standards provide the basis for the evaluation. Based on evaluation criteria and the budget, some employees may receive bonuses. Evaluation forms are available on the Intranet.

2.B.3 As a part of the review process employees provide a professional development plan to support their personal growth. The Human Resource budget includes continuing education monies. In addition, The Human Resources department offers trainings, seminars and webinars throughout the year.

The director of curriculum and faculty development coordinates faculty development activities. These include workshops, guest speakers and scholarships. In addition, faculty have an application process to utilize monies set aside for off-site conferences, courses and workshops. Two sabbaticals have been approved for the next year.

2.B.4 The College employs a sufficient number of qualified faculty to achieve its educational objectives. Efforts are made to recruit experts in their respective fields. Faculty are qualified to teach in their respective areas. A process is in place to assign faculty workload (didactic and/or clinic) based on student numbers and schedule of classes. The provost and program deans ensure that the faculty workload is fair and equitable and adheres to guidelines developed by the council on academic affairs.

2.B.5 Faculty responsibilities and workloads are commensurate with the College's expectations and are managed by the program deans. In addition, each faculty member is provided with a job description that defines the non-teach expectations, which provide a consistency within programs.

2.B.6 Full-time faculty are evaluated annually and adjunct faculty are evaluated at least once every five years. The program deans take into consideration the students' quarterly

evaluations, supervisor classroom observations and the faculty's self-appraisal. Each of the schools uses a specific and unique self-evaluation form.

## **Standard 2.C Education Resources**

2.C.1 Review of the college catalog demonstrates that each of the three schools within NCNM - Naturopathic Medicine, Classical Chinese Medicine, and Research and Graduate Studies - publishes either program outcomes or educational objectives. Student learning outcomes are included on all course syllabi that were reviewed. All degrees and certificates awarded are consistent with NCNM's mission "*to educate and train physicians, practitioners and pre-professionals in the art, science and research of natural medicine.*" Review of course descriptions in the catalog and sample syllabi from all programs indicate appropriate breadth, depth and rigor for the degree or certificate awarded. All degrees and certificates awarded lead to designators consistent with program content and recognized fields of study.

2.C.2 All three schools within NCNM publish either program goals, outcomes or objectives in the college catalog. The School of Naturopathic Medicine publishes program educational outcomes; the School of Classical Chinese Medicine publishes goals and educational objectives related to their awarded degrees; and the School of Research and Graduate Studies publishes program learning outcomes. Student learning outcomes are included in all reviewed course syllabi that are available to students in written form. Some, but not all syllabi include program and departmental outcomes.

2.C.3 Credit allocations for courses are based on a quarter system and are consistent with generally recognized standards in higher education. Reviews of course syllabi verify that student achievement of course outcomes is based on clearly described grading criteria established by the individual course instructor. Tracking completion of degree or certificate requirements and maintenance of student records are done by the registrar. The institution is implementing a process of collecting and analyzing data from students and faculty on the actual amount of time students spend outside of class for individual courses in order to inform the curricular reform efforts currently underway at NCNM in the Naturopathic Medicine and Classical Chinese Medicine programs.

2.C.4 Review of each degree's course descriptions and course sequencing in the catalog, along with review of the winter 2014 schedules, demonstrates appropriate design that builds from foundational concepts up to advanced topics in each program. Depth and breadth of program content appear adequate. Individual course assignments in reviewed course syllabi appear designed to assess synthesis of learning and achievement of published student learning outcomes for each degree program. Oversight of program and degree development is the responsibility of the program development team and the program and curriculum review committee. Requirements for admission and graduation are clearly defined in the catalog which is available on the NCNM website as well as in hard copy.

2.C.5 Faculty roles and responsibilities are described in the faculty handbook and further detail is found on the full time and adjunct faculty contracts. Faculty who teach or provide clinical supervision are individually responsible for assessing student achievement of specific course and clinic competencies. Faculty, through monthly faculty and clinic faculty meetings, collectively take responsibility for and ensure student achievement of learning outcomes for specific degree or certificate programs. Regular faculty participation on the program development team, the program and curriculum review committee and the faculty senate ensure they have a major role in the design, approval, implementation and revision of the curriculum. For example, faculty within the School of Research and Graduate Studies developed a recently launched (fall 2013) Masters of Science in Nutrition, faculty in the School of Classical Chinese Medicine are developing an entry level first professional doctoral program, and faculty under the direction of the provost and dean in the School of Naturopathic Medicine are currently engaged in a curricular re-engineering project.

There is excellent faculty representation on hiring committees directed by the Human Resource Office for all faculty positions and selected administrative positions related to academics and faculty activities. All faculty are invited to participate on hiring committees, and typically four to six core faculty participate. The hiring committee recommends a candidate to the program dean, who in turn makes a recommendation to the provost who makes the final hiring decision.

2.C.6 Library staff members attend some courses and instruct students on how to use library and information resources. Additionally, the library page on the NCNM website includes instructional information on how to use these resources. A review of sample syllabi did not provide strong evidence that faculty are working broadly with library personnel to ensure that the use of library and information resources is integrated into the learning process. While some syllabi described outcomes and required reading and assignments that would require specific demonstration of information literacy skills, this was not widespread. However, faculty from the Helfgott Research Institute, in partnership with library staff, developed six outcomes for evidence informed practice, research and information literacy skills. These clearly written outcomes were approved by the program and curriculum review committee and there is a plan to embed them across all curricula at NCNM. Discussion with deans and library staff demonstrated strong commitment to move forward and implement this plan.

2.C.7 Not applicable

2.C.8 The institution's credit transfer policy is clearly stated in the college catalog on page 15. Appropriate review of course content is conducted by specific academic administrators and/or faculty to assure substantial course equivalency and currency of material. Discussions are underway with the University of Western States (UWS) regarding an affiliation agreement that would describe transfer of credit policies between the naturopathic medicine program at NCNM and the chiropractic medicine program at UWS.

2.C.9 Not applicable. The institution does not offer undergraduate degree programs.

2.C.10 Not applicable. The institution does not offer undergraduate degree programs.

2.C.11 Not applicable. The institution does not offer undergraduate degree programs.

#### Graduate Programs

2.C.12 Review of each degree's course descriptions and course sequencing in the catalog, along with review of the program outcomes demonstrates appropriate depth and breadth of program content and appears adequate for the graduate degree awarded. All degrees and certificates awarded are consistent with NCNM's mission "*to educate and train physicians, practitioners and pre-professionals in the art, science and research of natural medicine.*"

Curriculum and program outcomes for the naturopathic and classical Chinese medicine programs are also appropriately influenced by their discipline's respective professional academic organizations and programmatic accrediting bodies. Assessment of students' intellectual or creative capacities, knowledge of the literature in their field, and engagement with research, scholarship and high level professional practice is conducted utilizing standard assessment methods for graduate and professional programs. Such methods include theses, capstone projects, research studies and the completion of clinical examinations at various stages of clinical training.

2.C.13 Admissions policies and criteria are clear and published in the catalog. Requirements for applicants include the completion of an application, essay, transcripts that include specific course prerequisites, description of technical standards and in person interviews for the naturopathic medicine and classical Chinese medicine programs. These well accepted methods of evaluating a student's aptitude and potential to succeed in a given program ensure the student's expectations and qualifications are consistent with the institution's mission and the program's requirements.

Retention and attrition data demonstrate an average attrition rate of approximately 28% since 1987. National board examinations pass rates for the naturopathic medicine program since 2010 generally are in the range of and frequently exceed the national average. Chinese medicine board examination results since 2006 consistently exceed the national average.

The institution's credit transfer policy is clearly stated in the college catalog on page 15. Appropriate review of course content is conducted by specific academic administrators and/or faculty to assure substantial course equivalency and currency of material.

2.C.14 NCNM does not grant credit for experiential learning that occurred prior to matriculation into the program per the transfer credit policy. No credit is granted for experiential learning that is external to NCNM's formal graduate programs. All credit for

field experiences, internships and clinical practices is a formal part of the specific graduate program at NCNM, and is approved, monitored and assessed by NCNM faculty and/or administrators.

2.C.15 The institution offers three degree programs (Doctorate in Naturopathic Medicine, Master of Science in Oriental Medicine and Master of Acupuncture) that prepare students for professional medical practice. Review of program learning outcomes and objectives, course descriptions, course syllabi, selected course materials and national board examination pass rates for these programs provides substantial evidence that they are appropriately directed toward high levels of knowledge and performance of skills directly related to effective practice within their respective professions. Review of several alumni surveys including a 2014 survey provided evidence that graduates in general do feel adequately prepared to practice their discipline effectively.

The School of Research and Graduate Studies offers two non-clinical graduate programs (Master of Science in Integrative Medicine Research and Master of Science in Nutrition) that prepare students with a degree to either complement a clinical degree, or to pursue a non-clinical career path in research or other areas. Review of program learning outcomes, course descriptions, course syllabi and selected course materials provides evidence that they are appropriately directed toward advancing the frontiers of knowledge in integrative medicine and nutrition by creating and applying knowledge. These programs are very new, therefore, there is little evidence available at this time to assess the effectiveness of these programs in achieving stated program outcomes.

#### Continuing Education and Non-credit Programs

2.C.16 Review of recent and upcoming continuing education classes offered for credit are well aligned with the institution's mission and goals. They are primarily designed to provide post-graduate education to naturopathic physicians, Chinese medicine practitioners, and natural medicine researchers. All proposed CE courses are reviewed by NCNM's staff and content experts for relevance and impact, and proposed programs are then forwarded to the appropriate external agencies (e.g. professional licensing boards) in order to be approved for continuing education units (CEU) credit. Non-credit continuing education classes are open to the public as community education. Common themes include healthy living and health promotion activities as well as informational and experiential classes to promote awareness of natural medicine practices.

2.C.17 NCNM does not offer continuing education activities for academic credit. CE courses are reviewed and approved as described above in 2.16.C. The Continuing Education Department maintains responsibility for the quality and management of all CE and community education activities. Learning objectives are developed and assessed for all courses offered by the department.

2.C.18 The process for approval to grant CEU credit is consistent with generally accepted norms for both naturopathic medicine and Chinese medicine. The Oregon

Board of Naturopathic Medicine, an independent, non-profit organization, reviews applications for proposed CE courses from NCNM, evaluates the course content for appropriate scope, rigor and credentials of presenter, and makes a determination of approval based on that evaluation. The National Certification Commission for Acupuncture and Oriental Medicine, a national, non-profit organization, evaluates applications for CE courses (called Professional Development Activities by the profession), for appropriate content, rigor and credentials of presenter and makes a determination of approval based on that evaluation. Similarly, and as needed, other state boards in the naturopathic and Chinese medicine professions evaluate CE/CEU offerings for their members.

The CE department requires that attendees complete evaluations of all courses and this information is analyzed to assess quality of content and presenter, and to ensure learning outcomes have been met.

2.C.19 The CE department maintains records of all continuing education and community education courses that include data about content. Reports on CE courses are submitted to the NCNM board of directors and to programmatic accreditors annually. It was reported that for the first time, the CE department did not rely on tuition revenue for its operational expenses last year.

Commendations:

- The Evaluation Committee commends NCNM for its leadership in fostering a significant improvement in the way faculty perceive their value and role within the college which has led to increased faculty engagement in institutional activities, including curricular development and reform efforts. [2.A.28, 2.C.5]

Compliments:

- The Evaluation Committee compliments the achievement of the Continuing and Community Education Department for generating a positive net revenue contribution to the institution last year for the first time and for its plan to continue that trend. [2.C.16]

## **Standard 2.D Student Support Resources**

2.D.1 NCNM provides appropriate student support systems for students that include free, no-limit counseling service, disability and academic accommodation services, tutoring, and college advising. The results of the Student Satisfaction Survey in 2013 revealed that students desired more career and personal counseling. Accordingly, NCNM has invested resources in Counseling and Career Services to enhance these areas. The committee recognizes that as academic programs are added and enrollment increases—this may put increased pressure on the infrastructure of student services to maintain high levels of student satisfaction with said services.

Tutoring support oversight was assigned to the associate dean of academic progress in the fall of 2012 due to the increasing demand of tutors both in the 1:1 tutoring sessions and the group tutoring sessions. During interviews, the committee verified that this transition is working well at the time of this report.

2.D.2 The institution makes adequate provision for the safety and security of its students and their property at all locations where it offers programs and services. The College has prioritized the safety and security of all its students, staff and faculty by observing and adhering to all state and federal regulations. The Office of Campus Safety promotes a safe and secure environment through the visibility of safety officers, preventive patrols, positive conflict resolution, and crime and awareness programs.

Students and employees are advised of campus security procedures at orientation and onboarding training. They are also advised on incident reporting and crime prevention during training.

Crime statistics, campus security policies, and other disclosures required under federal and state regulations are made available in accordance with those regulations. All crime information, including the annual campus security report and security policies, is also readily available online.

2.D.3 Consistent with its mission, core themes, and characteristics, the institution recruits and admits students with the potential to benefit from its educational offerings. All NCNM admissions policies, transfer, graduation, and academic requirements are published in the catalog and on the NCNM website. Students are admitted according to college policy that is consistent with its mission. The Office of Admission oversees the admission process at NCNM. It appears that the Admissions Office is adequately and appropriately staffed as a part of the overall enrollment management team. Academic, transfer and graduation requirements are described in the catalog and are consistently posted on NCNM's Intranet.

NCNM orients students to ensure they understand the requirements related to their programs of study and receive timely, useful, and accurate information and advising about relevant academic requirements, including graduation and transfer policies. The orientation program for new students is extensive and mandatory. All program requirements are reviewed and students re-admitted to NCNM must make an appointment with the Office of Student Life to determine if re-orientation is required.

2.D.4 In the event of program elimination or significant change in requirements, the institution makes appropriate arrangements to ensure that students enrolled in the program have an opportunity to complete their program in a timely manner with a minimum of disruption.

The College has strong academic advising through the various academic programs. Each student that enrolls at NCNM is assigned an advisor (or mentor for the MSiMR program) by the associate dean for academic progress. College advisors/mentors ensure that

students understand academic policies and procedures in order to meet graduation requirements.

As the College continues to plan for new programs, the Evaluation Committee believes NCNM will make available consistent and appropriate advising and retention services for students. NCNM's bylaws and policies are clearly delineated (NCNM Bylaws, Article II Dissolution of Assets and NCNM Policy BA.2.22, Teach-Out Policy) if there was a need for program elimination or significant changes in requirements.

2.D.5 The institution publishes in a catalog, or provides in a manner reasonably available to students and other stakeholders, current and accurate information that includes [various identified factors]:

NCNM has its catalog available online and provides information at all orientation programs. All information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, and required course sequences in the catalog were reviewed and the evaluation committee found these policies adequate and in line with the standard. Any updates or supplements to the catalog are provided to NCNM faculty, staff, and students in a timely manner.

2.D.6 Publications describing educational programs include accurate information on: National and/or state legal eligibility requirements for licensure or entry into an occupation or profession for which education and training are offered; descriptions of unique requirements for employment and advancement in the occupation or profession.

NCNM has published accurate information on eligibility requirements for licensure and/or entry into all academic fields or occupations for academic programs offered through the college. Graduates of the MSOM and MAc programs are eligible to apply for acupuncture licensure in the state of Oregon. MSOM graduates are eligible to take all exams administered by the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM). MAc graduates are eligible to take all NCCAOM exams except the Chinese Herbology Module exam.

NCNM meets all requirements of, and is accredited by, the Council on Naturopathic Medical Education (CNME). Completion of the ND degree at NCNM qualifies students to sit for a board licensing examination. Additional unique requirements and descriptions for employment and advancement in the profession were readily available online and in print.

2.D.7 The institution adopts and adheres to policies and procedures regarding the secure retention of student records, including provision for reliable and retrievable backup of those records, regardless of their form.

NCNM appears to have strong and secure records storage processes and procedures and is therefore, compliant with this standard. The Registrar's Office maintains permanent records of each student enrolled at NCNM. NCNM utilizes the Sonisweb student

information system for quality assurance and student records controls. College personnel are granted access to Sonisweb on a job-related, password-protected, need-to-know basis, as requested and approved by their department head.

During interviews, it was verified that NCNM has a current headcount of 550 students. All records are secured in the Registrar's Office and are backed-up at a secure, remote site off-campus. NCNM data and records have adequate security and provision for recovery in the event of disaster.

The institution publishes and follows established policies for confidentiality and release of student records. The College complies with the Family Educational Rights and Privacy Act (FERPA), for the protection and privacy of student education records.

2.D.8 The institution provides an effective and accountable program of financial aid consistent with its mission, student needs, and institutional resources. Information regarding the categories of financial assistance (such a scholarships, grants, and loans) is published and made available to prospective and enrolled students.

The Evaluation Committee verified that NCNM's Financial Aid Office performs adequately in supporting students as they pursue their education and adheres to the U.S. Department of Education Code of Federal Regulations pertaining to compliance surrounding distribution of consumer information. The Financial Aid Office collaborates with the Enrollment Management Team (scholarships are administered through the Office of Admissions for new students and the Advancement Office for matriculated students) to ensure aid is awarded and disbursed in a timely manner.

The Evaluation Committee learned that the hours of operation in the Financial Aid Office were from 9:00 a.m. to 3:00 p.m. During the interviews, it was discovered that providing evening hours beyond 3:00 pm would provide more access to financial aid counseling for working adults and nontraditional students. Given the anticipated growth of academic programs and the need to provide timely and accessible financial aid information to nontraditional, or adult learners, the Evaluation Committee identifies the need to implement hours of operation to include evening and/or weekend hours to better accommodate working adults.

2.D.9 Students receiving financial assistance are informed of any repayment obligations. The institution regularly monitors its student loan programs and the institution's loan default rate.

The Evaluation Committee determined that NCNM regularly monitors its student loan programs and the institution's loan default rate. The Financial Aid Office does an adequate job in reconciling all disbursements that have been drawn down from the Department of Education. The College appears to consistently provide information regarding the categories of financial assistance. This financial information is published and made available to all students as well as prospective students during interview sessions. The NCNM website provides students with definitions and explanations for the

various types of aid, including scholarships, grants, work-study, and both federal and private loans.

Additionally, The Financial Aid Office holds one-on-one counseling sessions with each of its students concerning consumer credit counseling, credit report assistance, and seeking alternative options to meet their emergency needs. The Financial Aid Office also conducts annual trainings related to budgeting, loan repayment and consolidation.

The Financial Aid Office staff also provides information to students on the actual costs of attending and provides 1:1 debt management counseling. The Evaluation Committee was very impressed by NCNM's cohort default rate. NCNM maintained a zero rate from 1999 until 2008, when it increased to 1.4%, reflecting one student in default who had been incapacitated and unable to make a timely payment with the lender. Additionally, the most recent cohort default rate reflects zero percent, including the three year default rate for the 2011 cohort. The financial aid director and staff work diligently to counsel NCNM students on debt management issues—they provide 1:1 counseling on debt management—which is impressive to the Evaluation Committee.

2.D.10 The institution designs, maintains, and evaluates a systematic and effective program of academic advisement to support student development and success. Personnel responsible for advising students are knowledgeable of the curriculum, program requirements, and graduation requirements and are adequately prepared to successfully fulfill their responsibilities. Advising requirements and responsibilities are defined, published, and made available to students.

The academic advising process at NCNM was reviewed and it was determined that the quality and delivery of the academic advising were strong and valued by the students. In fact, the Evaluation Committee learned that the Office of Student Life and the associate dean of academic progress collaborated on establishing a faculty advisor breakfast for incoming new students to foster communication and stronger advising collaboration. Additionally, an online faculty advisor handbook was created where faculty can access the link through the faculty support page on Moodle. The faculty advisor handbook provides advising resources as well as guidance on faculty advising.

Additionally, the associate dean of academic progress and the director of the NCNM counseling center collaborate to support the students with appropriate referrals as well as referrals to the on-campus clinic. Assessment is enabled through the annual student satisfaction survey and it has been the primary evaluation tool used to evaluate the program of academic advisement.

2.D.11 Co-curricular activities are consistent with the institution's mission, core themes, programs, and services and are governed appropriately.

NCNM produces co-curricular programs that are consistent with the institution's mission, core themes, programs, and services. Many of the clubs and organizations identified in the self-study have demonstrated consistent support of the mission and values.

The NCNM Student Government Association (SGA) serves as a forum that represents the common needs of the entire student body. The SGA also acts as a liaison for the student body and the board, administration, faculty and staff. NCNM's SGA oversees the management and distribution of the student activity fees collected each term with registration. SGA programming is robust and appears to be committed to enhancing all aspects of student life through programs that enrich students spiritually, culturally, socially, and intellectually.

2.D.12 The institution operates auxiliary services (such as student housing, food services, and bookstore) that support the institution's mission, contribute to the intellectual climate of the campus community, and enhance that quality of the learning environment. Students support the institution's mission, contribute to the intellectual climate of faculty, staff, and administrators have opportunities for input regarding these services.

The Evaluation Committee learned that the Ancillary Services Department at the National College of Natural Medicine delivers services, products and support to service the daily lives of faculty, staff, students and patients through the bookstore, medicinal, community clinics medicinal, and food service. These auxiliary services also provide learning opportunities for students in the bookstore and medicinal through the work study program.

Marketing and publicity for these services are communicated through collateral material, department communication (both electronically and in print) and through presentations made to all incoming students during orientation.

2.D.13 Not applicable. NCNM does not have intercollegiate athletic or other co-curricular programs.

2.D. 14 Not applicable. NCNM does not offer distance education.

Concern:

- The Office of Financial Aid should explore options for expanding the hours of operation beyond the current 9:00 a.m.-3:00 p.m. timeframe to better serve adult learners who are unable to meet with financial aid counselors during normal hours (day) of operation.[2.D.8]

Commendation:

- The Evaluation Committee commends NCNM on maintaining a zero percent three-year cohort default rate. [2.D.9]

## **Standard 2.E Library and Information Resources**

2.E.1 The library, while small in physical space at 4,500 square feet, provides adequate library and information resources through both its book collection as well as its growing

collection of electronic databases. A review of the library website demonstrated a collection of resources that provide adequate breadth, depth and currency of material that support the institution's mission, core themes, programs and services. The library provides the necessary resources and services to support the mission, core themes, and programs of the college. With 16,000 book volumes, more than 70% of the materials budget has been dedicated to online databases so that NCNM library users can access library resources anywhere and at any time via the Web. Interviews revealed that the Director of Library Services has requested for the FY 2014 budget cycle an additional \$15,000 to add a citation indexing system called Scopus to support research.

Additionally, the library is part of a Portland academic health sciences consortium library. Resources are enhanced through its strong collaborative relationships. Other consortium members are Oregon Health Sciences University (OHSU), University of Western States (UWS) and Oregon College of Oriental Medicine (OCOM). The consortium shares a library automation system and members enjoy full reciprocity for circulation of materials. A courier system picks up and delivers requested and returned materials to the consortium members on a weekly basis. NCNM students are taking advantage of this collaboration, as they are one of the largest user groups of the OHSU library.

The NCNM library is also implementing a new library automation system in 2014 that is used by the Orbis Cascade Alliance (Ex Libris). This automation and consortium collaboration makes this world class library system more affordable for NCNM.

On average, the NCNM library circulates more than 20,000 items; fills more than 1,200 interlibrary loan requests; and facilitates more than 30,000 online database sessions. The Evaluation Committee would also like to recognize the rare book collection of 1,500 old journals and books in the natural medicine fields. The Evaluation Committee learned that it is the most significant rare book collection in the naturopathic colleges, and includes donations from many of the founders of naturopathy in the United States.

2.E.2 Library planning is informed primarily through input received from the library committee which meets quarterly. This committee has representation from library staff, faculty, and students. The committee is a communication vehicle for library staff to inform the community about library issues and activities, and for library staff to hear opinions and concerns related to the library from faculty and students. Additional input is received informally by library staff, and by suggestions left in a library suggestion box. The library formerly also received data from library surveys, but the last library survey was conducted in 2010. Discussion with the director of library services indicated that data regarding library issues is now collected by the Department of Institutional Research. Discussion with the research and compliance department staff revealed that data related to library issues that is received from annual student satisfaction surveys is passed along to the library for assessment and planning purposes. Survey data have been used to improve services with student satisfaction levels enhanced.

The library has been attempting to connect its feedback loops more closely tied to the curricula with specific courses, outcomes and assessments that will measure the success of library service and resources in the learning that happens with students. There is a preliminary plan to reinstate the library survey and to evaluate strategies for enhanced assessment and planning. Library committee members also serve on search committees when library staff positions are advertised. They have also assisted with some of the difficult decisions that impact the budgeting process in the next fiscal year.

2.E.3 NCNM library supports the college mission and core themes by providing resources, services, and support for its people and educational programs. Students in the various academic programs,—particularly the Naturopathic and Chinese Medicine programs are provided with library instruction in specific classes (Clinical Correlates, Ways of Knowing). Library services and support are reviewed in the orientation process and through various onboarding debriefs with new faculty, staff, and students. Research and information literacy entails a thorough review of library databases and library research strategies.

The institution provides instruction and support for students, staff, faculty and administrators to enhance their effectiveness in obtaining, evaluating and using library and information resources in both informal and formal ways. Informal individual instruction on an as needed basis is provided to faculty, staff, administrators and board members based on their specific needs. The NCNM library has posted a FAQ list on the website that addresses frequently asked questions such as how to get CE credit for searches conducted on the Up-To-Date database. The reference desk staff will provide individual instruction—as needed—and maintains a reference question log for documenting reference questions and needs. The library regularly sends out email communications to all faculty and staff to announce new products or other resources.

2.E.4 Review and evaluation of the quality, adequacy, utilization and security of library and information resources occur through several processes: the strategic planning process which is conducted utilizing an online tool, quarterly library committee meetings, data from student satisfaction surveys, informal feedback to library staff and a suggestion box. Additionally, the library committee functions as both a formal and informal venue for library self-assessment as committee members funnel comments from their constituencies and provide their opinions about what might need improvement. Library surveys were discontinued after 2010, although there is a plan to reinstate them as data from student satisfaction surveys is not as robust as desired. Utilization metrics are collected and reported. Review of student satisfaction surveys, library committee meeting minutes and discussions with deans and faculty members demonstrated very high regard for the library and staff. The deans as well as the library director did report a need to have a more robust citation indexing system and more access to full text articles in order to meet program needs. Library personnel are committed to improving its operations and insuring that they align properly with the college's mission and core themes.

Compliment:

- The Evaluation Committee compliments the institution's rare book collection of 1,500 old journals and books in the natural medicine fields. The committee learned that it is the most significant rare book collection in the naturopathic colleges, and includes donations from many of the founders of naturopathy in the United States. The committee compliments NCNM on its plans to make these available to other educational institutions.

## **Standard 2.F Financial Resources**

2.F.1: The institution demonstrates financial stability with sufficient cash flow and reserves to support its programs and services. Financial planning reflects available funds, realistic development of financial resources, and appropriate risk management to ensure short-term solvency and anticipate long-term obligations, including payment of future liabilities.

Financial functions are centralized under the chief financial officer ("CFO"), who has more than 25 years of career financial experience and ten years with the college. The CFO reports directly to the president.

NCNM's 2013 annual revenue was \$19.7M with a profit of \$.9M and cash flow from operating activities of \$1.0M. The discount rate is less than 1% and the college's unrestricted reserves have increased to \$8.4M.

Since the College's available cash reserves are only sufficient to cover two and a half months of operations, they have negotiated a \$.5M line-of-credit to ensure they can pay their obligations in the periods immediately prior to receiving their fall tuition payments. Even though the College has not used its line-of-credit for nine years, the committee shares the College's concern that a larger reserve is needed. [2.F.1]

The College's strategic plan is called the '*A Framework for Action*' and was developed to tie directly into the college's mission and core themes. The strategic plan also ties directly into NCNM's Conditional Use Master Plan, which was approved by the City of Portland in September 2012. The approved Master Plan allows the College to proceed with its planned acquisitions and build outs without going back to the City for re-approval. Whereas, the Plan includes the expansion and upgrade of the College's foot print in chronological phases, as a practical matter the College treats these events as modules to give itself the flexibility to acquire properties as they become available and to create new structures, like the Min Zidell Healing Garden, when donors provide restricted gifts.

A review of financial data shows that the college has a \$4.5M lease/purchase agreement that is due on April 2016, or earlier if the owner provides 90 days written notice. NCNM has a bank commitment in place to finance 70% of this debt and pay the remainder with monies already in reserve. In addition, the college has \$7.1M in long-term debt that includes a \$4.7M bank note due for repricing in April 2018.

The annual Board Self-Evaluation Survey includes question #22 “The board reviews the institution’s projected three-year financial plan annually.” Given the \$4.5M and \$4.7M debt obligations that are coming due in 2016 and 2018, respectively, and given the board’s expectation to review the institution’s projected three-year financial plan on an annual basis, as expressed in its annual Board Self-Assessment survey, the committee recommends that NCNM produces and provides the board with an annual financial projection that includes a breakout of revenue, expenses, endowment draw, capital outlays, debt payments and cash flow. [2.F.1]

2.F.2 and 2.F.3 NCNM’s budgets are zero based and include enrollment projections. Once the board sets budget assumptions all stakeholders submit requests that are evaluated and prioritized by senior management to support the strategic plan. Unrestricted grants and donations are not included in the budget. Research grants are included in the budget if a contract is in hand.

Based on a positive review of NCNM’s February year-to-date financial performance against plan, it is determined that the College used realistic estimates of grants, donations, enrollment revenue and auxiliary services in the preparation of its budget. All debt and all expenses over \$75,000 must be approved by the board.

2.F.4 The College uses Sage as its administrative software program. Financial reports are distributed monthly to appropriate stakeholders. Internal controls are owned by the CFO.

2.F.5 The capital budget process mirrors the operating budget process and supports the strategic plan and core themes. Capital spending is funded by operations, donations, endowment draws and external funding.

The board pre-approves all debt. The college’s long term debt, including a note payable is \$11.7M, of which \$4.5M is due in 2016 and \$4.7M is due to be refinanced in 2018.

2.F.6 Auxiliary services include the clinic and the book store. The book store operates on a break-even basis and a portion of the clinic is subsidized by tuition. Tuition accounts for 75% of total revenue.

2.F.7 The annual external audit is prepared by Hoffman, Stewart & Schmidt, P.C. The most recent audit produced an unqualified opinion and there were no material weaknesses. There were no findings for the 2013 audit. The auditor was approved by the board and the audit report is presented to the board’s finance committee.

The annual Title IV audit is also prepared by Hoffman, Stewart & Schmidt, P.C., which was also approved by the board and a copy of the report is submitted to the board’s finance committee. There were three minor Title IV findings in 2013 that have been addressed by the college.

Fundraising and Development

2.F.8 Fundraising is the responsibility of the president and the vice president of advancement. The vice president of advancement has been with NCNM for twelve years and reports directly to the president.

The board has oversight over advancement's activities with some specific areas covered by the board's executive and finance committees. The vice president of advancement provides a written report for the board and meets with the board's finance committee and the full board at its November, February and June meetings.

NCNM does not have a relationship with any fundraising organization that bears its name. The college has a fund raising code of ethics that was re-approved by the board in June 2013. Hoffman, Stewart & Schmidt, P.C conducts the annual audit and there were no audit findings in 2013.

In 2009, the college initiated the "Right Time, Right Place" capital campaign to raise \$25M over five years. Through March 2014 the campaign had \$8,992,424 in pledges for cash and gifts in kind and the College has made the decision to extend the capital campaign through 2018. The money raised has been and will be used to fund facilities, renovations and pay down a portion of the \$4.5M debt that comes due in 2016. The college's endowment is \$417k, of which \$413k is restricted.

The College also has a "Partner's Program" that raises funds for scholarships and general operations. Currently, the college has approximately 2,300 alumni that generate a total of \$25k to \$50k a year and, in some cases, provides outreach to prospective donors.

Concern:

- Since the College's available cash reserves are only sufficient to cover two and a half months of operations, they have negotiated a \$.5M line-of-credit to ensure they can pay their obligations in the periods immediately prior to receiving their fall tuition payments. Even though the College has not used its line-of-credit for nine years, the committee shares the College's concern that a larger reserve is needed [2.F.1].

Recommendation:

- The annual Board Self-Evaluation Survey includes question #22 "The board reviews the institution's projected three-year financial plan annually." However, the College does not produce a future looking financial projection. Given the \$4.5M and \$4.7M debt obligations that are coming due in 2016 and 2018, respectively, and given the board's expectation to review the institution's projected three-year financial plan on an annual basis, as expressed in its annual Board Self-Assessment survey, the committee recommends that NCNM produces and provides the board with an annual financial projection that includes a breakout of revenue, expenses, endowment draw, capital outlays, debt payments and cash flow. [2.F.1].

## **Standard 2.G. Physical Infrastructure**

2.G.1 Facility planning is led by the facilities manager, who has a staff of two. The manager has been in his current job for five years and has five years of experience in facility management.

The college is located just outside of the main Portland down town area. It has easy access by car and public transportation, which is the preferred method by most students, faculty and staff. NCNM had 562 students (fall), 550 students (spring) and 320 employees, including models used for classes, subs in clinic, on call people, etc.

The majority of the College's activities reside in four buildings. The College owns three of the buildings: the Administrative Building, the Academic Building, and the Helfgott Research and Community Education Building. NCNM has a lease-purchase agreement with the fourth property, the Clinic and adjacent Service Building. The College also owns three other small properties.

All buildings have been built to or have been retrofitted to meet minimum ADA standards, except for the Service Building that does not have an elevator that goes to the second floor. This second floor is used for campus storage and on a temporary basis is used by some staff who do not require accommodations. The second floor is not accessible to the general public.

The college does a good job addressing deferred maintenance. Over the last four years several areas of campus received remodeling or upgrades, including a library expansion, opening a larger bookstore, adding fifty student work stations, opening a new integrated teaching clinic, dispensary and lab, expanding the student lounge area, upgrading lecture room 107, adding office and administrative space, repurposing the former ND Clinic into the Helfgott Research Institute and Community Education Center and opening the Min Zidell Healing Garden.

NCNM has an active safety committee that meets monthly and has ten members, including a student representative. Campus security roams the grounds whenever the college is open.

2.G.2 Hazmat compliance is the responsibility of the Facilities Department. The College has a written Hazmat policy that was last reviewed in February 2014 and the college is compliant with its policies. Hazmat training is provided to facility employees and others that use chemicals and every NCNM employee receives mandatory annual OSHA training through a third party, 'Physician's Resource.' Steri Cycle disposes all of the college's bio waste and the college disposes its facilities hazardous materials through Metro.

2.G.3 The College's 2012 'Campus Master Plan' was built to support its strategic plan, which is called '*A Framework for Action.*' The strategic plan supports the College's core

themes and mission. The Campus Master Plan covers a twenty year period and is broken into multiple phases.

2.G.4 The grounds are well maintained, clean, sufficient in quantity and provide a suitable work and learning environment. The college has sufficient equipment that is well maintained. Conversations with faculty indicated no shortage of operating supplies or equipment.

2.G.5 Technology functions are centralized under the information technology manager. He has been with the college for twelve years and has fourteen years of professional information technology (“IT”) experience. The manager reports directly to the chief financial officer and has a staff of two.

The College’s classrooms are adequately equipped with the appropriate technology and equipment to support their education outcomes. The servers are supported by redundant power supplies and battery backups. Wireless internet is available in all campus common use areas and most classrooms, with plans to provide wireless connectivity to all classrooms.

The Technology Department maintains an equipment inventory. Personal computers and workstations are replaced on a six to eight year rotating basis. Plans are in place to upgrade all PCs to Windows 7 by May 2014 and to upgrade all server hardware and software by May 2015.

Electronic data are guarded by a ‘Watchguard’ firewall that separates the student and employee networks from each other and from the public domain. The data are backed up daily and stored securely on site in a fire proof vault. In addition, a monthly backup is stored in a Portland area bank safety deposit box.

2.G.6 Initial student training on student email and systems occurs during orientation with additional training and ongoing support as needed. Faculty, staff and administrator training is also conducted as needed. Computer labs are adequate in quantity and are accessible to the students eleven hours a day. NCNM’s website is user friendly and is easy to navigate.

2.G.7-8 NCNM’s Information Technology Team (“ITT”) includes faculty, staff and students and is chaired by the Manager. The ITT meets once a term to discuss IT related issues and to prioritize IT activities. Minutes are posted on the internal Moodle website. The IT Department drafts an annual ‘NCNM Technology Plan’ that is posted for comments and reviewed by the CFO prior to its official release. The annual technology plan is available to all employees.

## **VIII. Commendations and Recommendations**

### **Commendations**

1. The Evaluation Committee commends the College community for creating a culture of respect and valuing of other ideas, suggestions and opinions. [2.A.1]
2. The Evaluation Committee commends the College for its Communication Model that ensures integration and interconnections between and among the numerous units and support areas.[2.A.11]
3. The Evaluation Committee commends NCNM for its leadership in fostering a significant improvement in the way faculty perceive their value and role within the college which has led to increased faculty engagement in institutional activities, including curricular development and reform efforts. [2.A.28, 2.C.5]
4. The Evaluation Committee commends NCNM on maintaining a zero percent three-year cohort default rate. [2.D.9]

### **Compliments**

1. The Evaluation Committee compliments the achievement of the Continuing and Community Education Department for generating a positive net revenue contribution to the institution last year for the first time and for its plan to continue that trend. [2.C.16]
2. The Evaluation Committee compliments the institution's rare book collection of 1,500 old journals and books in the natural medicine fields. The Committee learned that it is the most significant rare book collection in the naturopathic colleges, and includes donations from many of the founders of naturopathy in the United States. The Committee compliments NCNM on its plans to make these available to other educational institutions.

### **Concerns**

1. The Office of Financial Aid should explore options for expanding the hours of operation beyond the current 9:00 a.m. -3:00 p.m. timeframe to better serve adult learners who are unable to meet with financial aid counselors during normal hours (day) of operation.[2.D.8]
2. Since the College's available cash reserves are only sufficient to cover two and a half months of operations, they have negotiated a \$.5M line-of-credit to ensure they can pay their obligations in the periods immediately prior to receiving their

fall tuition payments. Even though the College has not used its line-of-credit for nine years, the Evaluation Committee shares the College's concern that a larger reserve is needed. [2.F.1]

## **Recommendations**

1. The Evaluation Committee recommends that the board of directors formally approve the institution's academic freedom policy. [A.2.27]
2. The annual Board Self-Evaluation Survey includes question #22 "The board reviews the institution's projected three-year financial plan annually." However, the College does not produce a future looking financial projection. Given the \$4.5M and \$4.7M debt obligations that are coming due in 2016 and 2018, respectively, and given the board's expectation to review the institution's projected three-year financial plan on an annual basis, as expressed in its annual Board Self-Assessment survey, the Evaluation Committee recommends that NCNM produces and provides the board with an annual financial projection that includes a breakout of revenue, expenses, endowment draw, capital outlays, debt payments and cash flow. [2.F.1]

## Appendix A: List of Individuals Interviewed

David McAllister, Facilities Manager  
David Berkshire, Chair of the Curriculum Review Committee  
Jerry Bores, VP of Finance & Administration/CFO  
Winston Cardwell, Board Member  
Marilynn Considine, Director of Communications/PR  
Joshua Corn, Co-leader, Student Governance Association  
Dr. Denise Dallmann, Director of Curriculum and Faculty Development  
Don Drake, Board Member  
Jenapher Dues, Human Resource Generalist  
Steve Fong, IT Manager  
Kelly Garey, Registrar  
Ellen Goldsmith, Chair, Board of Directors  
Brandon Hamilton, Director of Admissions  
Noelle Harling, Associate Librarian  
Melanie Henriksen, Dean, School of Naturopathic Medicine  
Kimberly Howes, Co-leader, Student Governance Association  
Susan Hunter, VP Advancement  
Richard Jones, Board Member  
Patricia Kramer, Board Member  
Laurie McGrath, Director of Institutional Research & Compliance  
Cheryl Miller, Dean of Students  
Keith North, Director of Campus Development  
Georgia Portuondo, Institutional Research Analyst  
Laurie Radford Director of Financial Aid  
Laurie Regan, Dean, School of Classical Chinese Medicine  
Steven Sandberg-Lewis, Faculty Senate Co-Chair  
David Schleich, President  
Rick Severson, Library Director & Academic Development Assistant to the Provost  
Andrea Smith, VP Academic Affairs & Provost  
Jo Smith, Board Member  
Sandra Snyder, VP Marketing & Communications  
Kim Windstar, Faculty Senate Co-Chairs  
Andrea Wolcott, Board Member  
Heather Zwickey, Dean, Research and Graduate Studies