

# ACCREDITATION COUNCIL POLICIES AND PROCEDURES

## Introduction

Accreditation is a widely used review process for higher education programs and institutions in the U. S., including a variety of professional programs in medical/healthcare fields. Accreditation in the context of higher education is defined as the granting of public recognition to a program of study and/or an institution that meets or exceeds an established set of standards. Accreditation serves two functions: it is a quality control mechanism whereby a credible, objective third party gives a public stamp of approval to an educational program; additionally, accreditation is a peer-review process that supports the ongoing improvement of a program. Both of these functions protect the interests of a variety of stakeholders, including students, private and public lenders, patients—and, ultimately, the general public.

As is in other academic fields and professions, the National Ayurvedic Medical Association (NAMA) uses a peer-review process—conducted by the NAMA Accreditation Council (NAMAAC)—to determine whether a program meets or exceeds the NAMAAC accreditation standards. The NAMAAC makes its determination based on a careful review of the application form and supporting materials submitted by a school for its Ayurvedic medicine training program. The NAMAAC evaluates whether the information and materials submitted by the school demonstrate that the program’s content and delivery comply with the requirements set forth in the NAMAAC accreditation standards and policies. While many accrediting agencies also require an onsite/campus visit to verify compliance with accreditation standards and policies, the NAMA process is currently solely a paper-based review process. However, NAMA may in the future require an onsite visit, a procedure that the U.S. Department of Education (USDE) mandates for an accrediting agency interested in seeking USDE recognition. More information on USDE recognition of accrediting agencies can be found at: <https://ope.ed.gov/accreditation/>

The purpose of the *NAMA Accreditation Handbook* (“Handbook”) is to set forth the accreditation standards and policies adopted by the NAMA Board that schools and programs must meet in order to achieve accreditation status; also, the Handbook sets forth the policies and procedures the NAMA Accreditation Council follows in processing, reviewing, and making decisions on the accreditation applications submitted by schools offering Ayurvedic medicine training programs. Finally, this Handbook contains policies and procedures that pertain to Ayurvedic medicine training programs that have achieved NAMAAC accreditation. Any questions or comments regarding these standards, policies and procedures should be directed to the NAMAAC Administrator.

These standards, policies and procedures are intended to provide a clear roadmap to schools, as well as to ensure that the accreditation review process is conducted in an objective, fair and timely manner that affords programs and individuals reasonable due process.

### 1. Policy on Submission and Review of Applications for Initial Accreditation

An Ayurvedic medicine program may begin the accreditation application process at any time. If a program has questions about its readiness to seek accreditation or the review process, it may contact the Accreditation Committee (NAMAAC) Administrator to discuss its situation.

As described below, there are two sequential steps in the application process: submission of an “eligibility application” and submission of an “accreditation application.” The purpose of the eligibility application is to demonstrate that the program has a reasonable likelihood of being granted accreditation if it chooses to apply, meaning that the program appears to meet NAMAAC’s basic requirements. If the eligibility application is approved, the program is eligible to apply for accreditation.

## 1) Eligibility application

Before a program is allowed to submit an application for accreditation, it must first submit an eligibility application that includes the following:

- An attestation that the school's governing entity (e.g., board of directors, school owner) has authorized the school to seek accreditation for its Ayurvedic medicine program;
- A general description of the school and the program(s);
- A copy of the school catalog and student handbook (or similar documents);
- Documentation showing that the program curriculum meets the NAMAAC accreditation standards in regard to program hours, curriculum content, clinical training and delivery methods;
- A list of program faculty with summary information on their professional qualifications;
- A list of institutional staff with positions indicated; and
- A description of the institution's facilities.

Within four weeks of receipt, the NAMAAC administrative office will inform the school whether the eligibility application—including the required documentation—is complete. If the eligibility application is complete, a NAMAAC eligibility review committee will review the eligibility application within three months of receipt of the completed eligibility application to determine whether the program appears to be at a stage of development that would enable it to achieve accreditation, and is therefore eligible to apply for accreditation. The review committee will either authorize the school to proceed to the next step—formal submission of an application for accreditation—or will inform the school of those areas where the school/program is not yet developmentally ready to seek accreditation. Note that approval of the eligibility application and permission to move to the next step of the accreditation application process **does not guarantee or imply** that the program will succeed in attaining accreditation.

If the program is notified that it is eligible to apply for accreditation, then the program must initiate the process within two years of receiving notification, and must complete its application within three years. If it does not apply for accreditation within the 2-year time period—or fails to complete the application within three years—it must submit a new eligibility application before it may seek accreditation.

If a program is denied permission to apply for accreditation, it may—within 30 days of being notified that the eligibility application has been denied—request the NAMAAC to review the eligibility application. The decision of the NAMAAC in this case is final and may not be appealed. If a program's eligibility application is not approved, the program must wait at least six months before submitting a new eligibility application. Whenever a new eligibility application is submitted, the eligibility application submission fee applies.

Programs should contact the NAMAAC administrator for information on how to initiate the eligibility application process.

## 2) Initial Accreditation Application

If the NAMAAC review committee determines that the program's eligibility application demonstrates its readiness to seek accreditation, the program will be informed of this decision and invited to submit an accreditation application within two years in accordance with NAMAAC procedures. Once the application is submitted, the NAMAAC administrative office will:

- Inform the program that the application has been received within two weeks of submission; and
- Verify within four weeks whether the application submission is complete, including inclusion of all required materials and payment of the application fee, and inform the program of the timeline for processing the application. Note that the NAMAAC will conduct the review of completed

applications within six four of receipt, but can extend this time period if materials are missing or if more information is needed.

If the application is incomplete, the NAMAAC administrative office informs the program of the deficiencies, including any missing information and/or documentation. The program has one year in which to remedy deficiencies by submitting additional materials; if, within this time period, the deficiencies are not satisfactorily addressed, the application lapses and the program will be required to submit a new accreditation application and pay the application fee if it wishes to apply for accreditation.

If the application submission is deemed complete, the application is forwarded to an accreditation review committee for review; as noted above, the committee's review process takes place within four months of receipt of the complete submission. The NAMAAC provides the program with the names of the review committee members; if the program has any concerns regarding any potential conflict of interest or other factor that might raise a concern about a member's objectivity, it may request within two weeks of receiving the names that NAMAAC consider replacing the member, providing the rationale for doing so. The NAMAAC's decision on the accreditation review committee's composition is final.

The review committee may either (i) request additional information or documentation to be provided within a specified time period, or (ii) forward the application to the NAMAAC along with a report on the application summarizing the committee's determinations on the program's compliance with accreditation standards and policies, and with a confidential, formal recommendation regarding accreditation of the program. The program is also provided with a copy of the committee's report at the same time, and is given 30 days to respond to the report if it should wish to do so. The confidential, formal recommendation is not provided to the program.

In the event that the review committee forwards the application to the NAMAAC for review, the NAMAAC will hold a meeting within four months of receipt to evaluate the application, and will inform the program of the meeting date. At the meeting at which it evaluates a program's application, the NAMAAC holds a hearing in closed session on the accreditation application. The NAMAAC may require representatives of the program to be in attendance via conference call to provide information and answer questions, and also the program may request the opportunity to appear before the NAMAAC via conference call. Following any discussion with program representatives, the representatives leave the hearing and the NAMAAC makes a decision on the application. Note that if, at any time prior to the hearing on accreditation, the program's circumstances change in such a way that might render the program no longer in compliance with the accreditation standards and policies, the program must notify the NAMAAC of the changes.

Based on its own review of the application and the review team's recommendation, the NAMAAC may:

- a) Approve the application and grant initial accreditation status for a period of up to five years;
- b) Approve the application and grant accreditation status for a period of up to five years, with conditions (e.g., that certain deficiencies be remedied within certain timeframe);
- c) Request additional information or documentation to be provided to the NAMAAC within a specified timeframe;
- d) Defer action on the application for a period not to exceed one year due to the program's lack of compliance with the NAMA's standards and policies (see below); or
- e) Deny accreditation due to substantial lack of compliance with the NAMA's standards and policies.

The NAMAAC's decision is conveyed to the program in writing within two weeks of the hearing.

In the event that a program fails to provide requested information or materials within the timeframe specified by the NAMAAC in accordance with Section c) above, the application automatically lapses. In

the event of a lapsed application, the program must submit a new eligibility application along with a new fee if it wishes to seek accreditation at a later time.

The NAMAAC may defer action in accordance with Section d) above if it believes that the program is not yet in compliance with the NAMAAC standards and policies, but is capable of coming into compliance within a specified time period. If the NAMAAC defers action on the accreditation application, the NAMAAC will inform the program of its deficiencies and request the program to provide information and documentation demonstrating that it has satisfactorily addressed the deficiencies identified by the NAMAAC within the time period specified. An action to defer a decision on accreditation cannot be appealed. If the program fails to address the deficiencies within the time period specified by the NAMAAC to the NAMAAC's satisfaction, the NAMAAC may deny accreditation, in which case the program must submit a new eligibility application should it wish to seek accreditation at a later time.

If the NAMAAC denies accreditation, it will inform the program of the deficiencies upon which the decision to deny was based. A decision to deny accreditation may be appealed in accordance with the Policy on Appeals. If the NAMAAC denies accreditation to a program, the program must wait at least one year from the date of denial before it may submit a new eligibility application along with the applicable fee.

A program may decide to withdraw its accreditation application at any time prior to a final decision of the NAMAAC to approve or deny the application. If the program does so, NAMA refunds half of the application fee. A program that withdraws its application must wait at least one year before resubmitting a new eligibility application and it must pay the applicable fee.

Note that in the event that a program is denied accreditation or withdraws its accreditation application, the NAMAAC may, at its discretion, waive the requirement for submission of a new eligibility application and allow a program to reapply directly for accreditation; in this case, it is required to pay the accreditation application fee.

### **3) Reaccreditation**

The NAMAAC accredits programs for a period of up to seven years. If a program wishes to maintain its accreditation, it must reapply for accreditation at least one year prior to the expiration of the accreditation period according to the process established by the NAMAAC and pay the reaccreditation fee.

## **2. Policy on Public Comments**

The NAMAAC invites written public comment on a program whenever the NAMAAC has scheduled a hearing and plans to take action on a program's accreditation status—namely, whenever the NAMAAC reviews a program for initial accreditation or reaccreditation. The NAMAAC provides for a public-comment period of at least 21 days' duration before the meeting at which the hearing is scheduled.

The NAMAAC places on its website and, at its discretion, circulates an official public-comment notice to relevant organizations and agencies. Additionally, the program must publicize the public-comment notice to its students, staff and faculty, as directed by the NAMAAC. The official notice contains the name of the program, the accreditation action before the NAMAAC, the date of the NAMAAC meeting, and the date for the ending of the public-comment period (which is at least 15 days before the NAMAAC's meeting). Commenters must identify themselves and their organizational affiliation to the NAMAAC; however, the NAMAAC keeps confidential the names and affiliations of commenters.

### 3. Policy on Appeals

The following NAMAAC decisions are considered “adverse decisions” and may be appealed:

- a) Denial of initial accreditation or reaccreditation; and
- b) Withdrawal of accreditation status.

If a program receives an adverse decision, the NAMAAC provides two appeals procedures described below: (i) reconsideration, and (ii) panel review. Reconsideration must be completed before moving to panel review.

#### Reconsideration

Programs may challenge an adverse decision if, in the opinion of the program, the NAMAAC’s decision is arbitrary, capricious, or violates procedures. The program’s written request to the NAMAAC Administrator must be made within 30 days following its receipt of notice of the adverse decision (all adverse decision letters are sent certified). A request for reconsideration must relate to the conditions that existed in the program at the time of the NAMAAC’s adverse decision and state specific reasons why the reconsideration should be granted.

When reconsideration is requested, the NAMAAC Administrator sets the date and time for a hearing (which may be conducted electronically or in person), and appoints a reconsideration committee of three members of the NAMAAC who were not part of the original accreditation review committee. The program may request an opportunity for board members, staff, and/or faculty to address the reconsideration committee during the hearing; however, legal counsel, students, and other interested parties are not permitted to attend the hearing. The program shall bear any expenses incurred in attending the hearing.

Following the hearing, the reconsideration committee reviews the documentation on which the NAMAAC based its decision and any written or verbal clarifying information provided by the program. The reconsideration committee makes one of following decisions:

- a) **Uphold the original NAMAAC decision.** If the reconsideration committee believes that the original NAMAAC decision was correctly arrived at, it decides to uphold the original decision. The program will then respond as originally required in the original NAMAAC decision letter.
- b) **Revise the decision.** If the reconsideration committee believes that the NAMAAC decision was in error—based either on a review of the original application and/or on clarifying information subsequently provided by the program—the committee may revise the NAMAAC decision and issue a letter with the revised decision and instructions to the program regarding the next step it should take.

The reconsideration committee’s decision is reported in writing to the school’s leadership. If the school accepts the decision of the reconsideration committee, it is expected to follow the instructions contained in the letter informing the program of the decision. If the program does not accept the decision of the reconsideration committee, it may request a panel review. An accredited program retains its accredited status (if applicable) until the appeal process is completed.

#### Panel Review

The second and final appeal process available to the program is a panel review, which is an independent consideration of the NAMAAC’s decision. The school’s written request for a panel review must be made within 30 days of receipt of the NAMAAC’s certified letter upholding an adverse decision. If the school fails to respond within 30 days, it waives the right to further review.

The school requests a panel review if, despite the reconsideration process, it still believes the NAMAAC's action was arbitrary, capricious, or otherwise not in accordance with the NAMAAC accreditation standards or procedures; or, the NAMAAC action was not supported by substantial evidence in the record.

Within 30 calendar days of receipt of the panel review request, the chair of the NAMA Board of Directors appoints a chair and two or more review panel members from a list of Ayurvedic medicine educators and practitioners who are members of NAMA. Members of the review panel may not include current members of the NAMAAC or any individuals deemed to have conflict of interest; it may include one member from the NAMA Board. The chair of the review panel specifies the time and place of the review.

The panel will review evidence in the record, including documentation and witness statements directly related to the NAMAAC's adverse decision and the reconsideration hearing. The record includes:

- The school's application for accreditation (including appendices);
- Any additional material submitted to the review committee;
- The NAMAAC decision letter detailing the adverse decision; and
- Materials from the reconsideration hearing.

The review panel may conduct its review in person or electronically. All costs related to the panel review are paid by the school; the school is invoiced in advance of the review for the estimated amount, which must be paid prior to the panel review. These costs may include travel and accommodations for the review panel and participants in the proceedings, reproduction of materials presented at the hearing, and other related expenses. If the panel decides to remand the matter to the NAMAAC with the instruction that the adverse decision be reversed, the NAMAAC and the appellant each bears its own expenses.

The NAMAAC submits the record compiled to date and the program's written request to the review panel, including any additional evidence submitted by the program challenging the NAMAAC's procedures or its facts. The chair of the review panel presides at the review hearing and rules on procedure, conducting the hearing in a manner that allows the program due process and a fair opportunity to present its case and explain its position (the formal rules of evidence, however, do not apply). The program may be represented by counsel during the hearing, and counsel may question any witnesses who speak at the hearing—again with the understanding that the formal rules of evidence do not apply. Review panel members may question any witnesses or parties to the appeal.

After considering the record and conducting the hearing, the review panel may make any of the following determinations:

- a) Uphold the NAMAAC action;
- b) Revise the NAMAAC action; or
- c) Reverse the NAMAAC action.

The chair of the review panel reports the panel's determination in writing to the school's leadership, the NAMAAC chair, the President of NAMA, the NAMA Executive Director, and the NAMAAC Administrator. Upon notification of the panel's determination, the NAMAAC takes the necessary steps to carry it out.

If, at any time during the appeals process, an appellant initiates legal action against the NAMAAC or NAMA, the above procedures are no longer in effect and the NAMAAC's original action is final.

#### 4. Policy on Formal Complaints against NAMA-Accredited Programs

The following are the procedures the NAMAAC follows in addressing a complaint against a NAMA-accredited program:

- 1) Formal complaints must be submitted to the NAMAAC Administrator. Complaints must pertain to matters related to program compliance with the NAMAAC accreditation standards and policies that allegedly occurred within the previous four years. Persons, groups, or organizations related to the program are considered recognized complainants and may file a complaint.
- 2) The NAMAAC does not adjudicate, arbitrate, or mediate individual faculty, staff or student grievances against a program. Complainants must use all appropriate institutional and professional channels of appeal before filing a formal complaint with the NAMAAC. The schools in which programs are housed assume responsibility for implementing and enforcing their own policies in these areas. When alleged violations cannot be resolved within the school, appellate procedures within state systems of vocational and higher education—or state judicial courts—should be used to assess and enforce institutional compliance with policies.
- 3) The NAMAAC will not take action on anonymous complaints, and does not make public formal complaints it receives.
- 4) When an oral complaint against an accredited program is received, the complainant is referred to this policy statement and advised that complaints must be submitted to the NAMAAC Administrator in writing with sufficient documentation to substantiate the complaint.
- 5) When a written complaint against an accredited program is received, the NAMAAC Administrator acknowledges receipt of the complaint in writing within ten business days.
- 6) The NAMAAC Administrator analyzes the complaint to determine whether the complaint:
  - (i) is adequately documented;
  - (ii) indicates non-compliance with any of the NAMAAC’s accreditation standards or policies; and
  - (iii) if applicable to the specific complaint, has been previously submitted to the program (or school) and has been reviewed by the program (or school) in accordance with its grievance and/or appeals process.
- 7) The NAMAAC Administrator notifies the complainant in writing within 30 days if documentation is inadequate or the complaint does not indicate non-compliance with the NAMAAC’s standards or policies. Depending on the nature of the complaint, or if the program’s or school’s grievance and appeals procedures have not been utilized, the NAMAAC Administrator advises the complainant to seek resolution through this process.
- 8) When a complaint indicating non-compliance with the NAMAAC’s standards or policies is adequately documented—or a pattern or practice of non-compliance appears to be present when considering past complaints received against the program—the NAMAAC Administrator sends written notification to the school that a complaint has been filed; the written notification either provides a report on the substance of the complaint or a copy of the actual complaint, and requests a written response to the complaint within 30 days.
- 9) When the written response from school is received, the matter is referred to the NAMAAC for review. Both the complainant and the program are notified of the referral.
- 10) The NAMAAC may take either of the following actions:
  - (i) Dismiss the complaint for insufficient information or lack of grounds; or
  - (ii) Require the program to undertake a remedial action specified by the NAMAAC.Note that at any time prior to making a decision, the NAMAAC may, at its discretion, ask for additional information from the complainant and/or the program, and may also request representatives of the program and/or the complainant to meet with the NAMAAC via conference call to answer questions and provide additional information.
- 11) The NAMAAC Administrator sends a written report of the NAMAAC’s action on the complaint

to the complainant and the program within 14 days of the board meeting at which the action was taken. This report constitutes the NAMAAC's final action with regard to the complaint and may not be appealed.

## **5. Policy on Formal Complaints against the NAMAAC**

The following are the procedures NAMA follows in addressing a complaint against the NAMAAC:

- 1) A complaint made against the NAMAAC must be submitted in writing with supporting documentation to NAMA's Executive Director. The complaint must be related to a failure on NAMAAC's part to comply with its own accreditation standards, policies, and/or procedures that allegedly occurred within the previous four years. Within 14 days of submission, the Executive Director acknowledges receipt of the complaint and refers it to the Executive Committee of the NAMA Board of Directors. Within 30 days from receipt of the complaint by the Executive Director, the NAMA Executive Committee (EC) reviews the complaint. If the EC needs additional information to review the complaint, it requests the complainant and/or the NAMAAC provide the information within 30 days; if it does not need additional information, it issues within the original 30-day period a written decision on the complaint to the complainant and NAMAAC. The decision of the EC is final.
- 2) If, at any time, a complainant initiates legal action against NAMA or the NAMAAC, the above procedures are no longer in effect and NAMA takes no action to review the complaint, pending legal resolution.

## **6. Policy on Substantive Program Changes**

The accreditation status of an Ayurvedic medicine training program pertains to the entire program, including all its sites and educational components. Initial accreditation or reaffirmation of accreditation covers only the components that existed and were reviewed at the time of the NAMAAC's accreditation review. Ongoing change is to be expected and is generally necessary to improve the educational quality of a program. Changes may take place within the program prior to the next scheduled accreditation review. Certain types of changes are to be reported on in the context of the school's annual report to the NAMAAC (see Policy #13 below); the annual report form indicates what information must be reported. Some other types of changes do not affect compliance with NAMAAC's accreditation standards and policies and need not be reported at all. Certain types of major changes, however, may affect the program's compliance and need to be reported to the NAMAAC; the NAMAAC refers to these latter changes "substantive changes."

In some cases, the program must simply report the substantive change to the NAMAAC; in other cases, the program must submit a substantive change application letter to the NAMAAC that describes the proposed change, provides full documentation for the program's justification for these changes, and specifies the accreditation standard(s) relevant to the change. The application letter must be approved by the NAMAAC prior to implementation of the proposed change. In all cases, the NAMAAC may seek additional information—and take other steps allowed under its policies—if it appears that a substantive change may have resulted in the program becoming non-compliant with the NAMAAC standards and policies. Should the NAMAAC learn of a change in a program that may be substantive in nature that the program has not reported on or submitted an application for, the NAMAAC may require the program to provide information on the change in question, and may—at its discretion—require the program to postpone the change pending submission of a substantive change application.



## **Examples of Substantive Changes that Require Reporting**

Generally speaking, substantive changes that require reporting are major changes that are unplanned, such as:

- Changes in the composition of the senior staff;
- A significant reduction in resources; and
- A significant change in how the school or program is regulated by other agencies.

## **Examples of Substantive Changes that Require Submission of an Application Letter and NAMAAC Approval before Being Implemented**

Generally speaking, substantive changes that require submission of an application letter are major changes proactively undertaken by the school, such as:

- A significant change in the program's mission or objectives, or how the program is delivered;
- Any change in the legal status, sponsorship, or control of the school that offers the program;
- A merger, collaboration, or affiliation with another institution/organization;
- Offering the accredited program at a branch campus or another instructional site where students can complete the entire program or a substantial portion of the program.
- A significant change in the quantity of education offered in the Ayurvedic medicine program (more than 25%), including additional courses or programs—or their deletion—that represent a significant departure in terms of content or delivery from those offered at the time of the NAMAAC's most recent evaluation of the program;
- A change in the credential awarded for completion of the program;
- The offering of a different program format for students from other healthcare professions; and
- The discontinuation/dissolution of an affiliation/collaboration, especially in the case where the NAMAAC awarded accreditation based on the affiliation/collaboration.

In cases where a program's administrative officers are uncertain whether a change they are considering is substantive, or whether prior NAMAAC approval is required, they should consult the NAMAAC Administrator.

## **Approval Process for a Substantive Change**

The purpose of the approval process is to ensure that a proposed substantive change is well planned, will be implemented in accordance with the NAMA's standards and policies, and will not adversely impact the NAMA-accredited Ayurvedic medicine program.

An accredited program has the responsibility of submitting a substantive change application letter to the NAMAAC Administrator at least two months prior to the planned implementation of a proposed substantive change. The application should state the nature of the proposed change, provide pertinent documentation, and present information that demonstrates that the program will remain in compliance with the NAMAAC's standards and policies if the change is adopted.

After the application letter is received, the NAMAAC Administrator, in consultation with the NAMAAC Chair, appoints a substantive change committee that meets within one month of receipt of the substantive change application to review the application. The substantive change committee may act to:

- 1) Approve implementation of the substantive change without any conditions;
- 2) Approve implementation of the substantive change with conditions;
- 3) Defer action pending receipt of additional information;
- 4) Refer the matter to the NAMAAC for consideration; or

- 5) Deny approval of the proposed change.

A program must receive written approval from the substantive change committee or the NAMAAC before implementing the change. A program that makes a substantive change without approval may be the subject of an action by the NAMAAC.

### **Summary**

It is the program's responsibility to notify the NAMAAC of program changes to ensure continued compliance with the NAMAAC standards and policies, and to submit an application letter prior to implementing a substantive change when required. Failure to report such changes and/or to submit an application may result in the NAMAAC taking action to address the situation. If a program is unsure whether notification of a program change or submission of an application is required by the NAMAAC, it should contact the NAMAAC Administrator.

### **7. Policy on Program Closure and Withdrawal of Accredited Status**

If a program wishes to either close or withdraw its accredited status, the school director sends a formal letter to the NAMAAC notifying the NAMAAC of its intention to close the program or withdraw its accredited status. The program is expected to make arrangements for current students to complete the accredited program or transfer to another accredited program, and should work closely with the NAMAAC during this planning process—at the conclusion of which the date of the program's formal withdrawal of accreditation will be decided. A program is expected to remain in full compliance with all standards during the closure or withdrawal process.

### **8. Policy on Failure to Submit Materials by the Due Date**

If a program that has submitted an accreditation application fails or refuses to submit any required or requested materials pertaining to its application by a date specified by the NAMAAC, the NAMAAC may deem the application lapsed. In this case, the program must submit a new application and pay the required application fee if it wishes to apply for accreditation.

If an accredited program fails or refuses to submit any required or requested materials pertaining to reaccreditation, the annual report submission, a hearing regarding a possible sanction, or any other NAMAAC process involving the program, the NAMAAC may take any action it deems appropriate, up to and including withdrawal of accreditation.

### **9. Policy on Potential Conflicts of Interest**

The decisions of the NAMAAC are to be made solely on the basis of promoting the best interests of the public, the Ayurvedic medicine profession, and the Ayurvedic medicine educational community. It is therefore the policy of the NAMAAC to have effective controls against conflicts of interest and the appearance of conflicts of interest by NAMAAC members, reviewers, consultants, staff, and other NAMAAC representatives. To this end, each NAMAAC member shall annually read and sign the NAMAAC's conflict of interest policy, and shall promptly inform the board of any changes in circumstances that may create new conflicts of interest.

Additionally, NAMAAC members shall strictly adhere to the following guidelines:

- 1) Whenever the NAMAAC enters into a hearing or any other process concerning an accreditation application or a recognition action related to an Ayurvedic medicine training program, and an

NAMAAC member is affiliated with the program, then that member:

- a. Shall disclose prior to the NAMAAC's discussion of the program's application or recognition action the nature of his or her affiliation with the program; and
  - b. Shall not be present during discussion of and voting on the program's application or recognition action.
- 2) For the purposes of this policy, a person is "affiliated" with an Ayurvedic medicine program if he or she, or a member of his or her immediate family (spouse, parent, child, brother, or sister):
- a. Is currently, or during the last seven years has been, an officer, director, trustee, employee, contractor, or consultant of the school in which the program is located;
  - b. Has been a student in the Ayurvedic medicine program within the last seven years; or
  - c. Has had during the last seven years other dealings with the school in which the program is located from which he or she has or will receive remuneration.
- 3) If for any other reason a NAMAAC member believes he or she has a conflict of interest or the appearance of one with regard to any program's application or recognition action before the NAMAAC, or otherwise believes that he or she cannot make an impartial decision in regard to these matters, the member shall declare the conflict of interest or the appearance of one.
- 4) If a representative of an Ayurvedic medicine training program that has an application or recognition action before the NAMAAC has reason to believe a NAMAAC member who has not declared a conflict of interest may have one or the appearance of one, then he or she may request the NAMAAC consider the matter. Similarly, if any other NAMAAC member, or the NAMAAC Administrator, is concerned about a NAMAAC member's possible conflict of interest, then he or she may also request the NAMAAC to consider the matter. Discussion of the possible conflict of interest or the appearance of one shall take place with all parties present; the matter shall be resolved, if necessary, by a majority vote of the NAMAAC, with all NAMAAC members entitled to vote with the exception of the member in question.

## **10. Policy on Advertising**

All representations regarding the school and its Ayurvedic medicine training program must be accurate. In the event that the NAMAAC determines that a program's advertising or other public representations are false, inaccurate or misleading, it will require the program to immediately correct or withdraw the advertising/ public representations in question. The NAMAAC may sanction an accredited program for knowingly or intentionally making false, inaccurate or misleading representations to the public.

If the advertising (or other public representations) for a program under review for accreditation is false, inaccurate or in violation of the NAMAAC's Policy on Representation of a Program's Relationship with NAMA/NAMAAC, the NAMAAC may, at its discretion, suspend the accreditation review until such time as the program discontinues the advertising in question

## **11. Policy on Sanctions**

The NAMAAC has the option, at any time, of investigating whether an accredited program may no longer be fully in compliance with the NAMAAC standards and policies. To this end, the NAMAAC may contact the program for information pertinent to any compliance concerns it may have, and may arrange a meeting with school representatives to discuss its concerns.

If in the judgment of the NAMAAC a non-compliance issue it identifies is relatively minor and can be readily addressed, the NAMAAC may— without applying a sanction—require the program to remedy the

issue within a specified timeframe and provide a report and documentation demonstrating that the issue has been remedied.

In situations where the NAMAAC determines that a program has fallen out of compliance with one or more NAMAAC standards and/or policies and that the non-compliance issues are serious and not capable of being readily addressed, it may apply a sanction. By applying a sanction, the NAMAAC informs the program that it must bring itself into compliance within a certain specified timeframe. The following are the three sanctions the NAMAAC may apply; they are usually, although not always, applied sequentially, starting with a letter of advisement:

- **Letter of Advisement.** The Ayurvedic medicine training program is formally advised by certified letter—sent to the school director and program dean/director (and/or other representatives of the school)—of deficiencies or circumstances related to the NAMAAC standards and policies that could lead to a more serious sanction if not corrected expeditiously. The letter requests a “focused report” by a specific date, generally not to exceed six months from the date of the letter (although the NAMAAC has discretion to specify a longer timeframe), that presents information and documentation on the steps the school/program has taken to address the deficiencies. The NAMAAC does not make public the fact that it has issued a letter of advisement.
- **Probation.** If a program fails to respond satisfactorily to a letter of advisement or continues to be non-compliant with accreditation standards or policies, it may be placed on probation, which is a public sanction. A certified letter is sent to the school director and program dean/director (and/or other representatives of the school), with a copy to the chair of the school’s governing board or the school owner, setting forth the deficiencies upon which the probation is based. The letter requests submission of a focused report and, optionally, an onsite visit by representatives of the NAMAAC by a specific date, generally not to exceed six months from the date of the letter (although the NAMAAC has discretion to specify a longer timeframe).
- **Show Cause.** If a program fails to correct the deficiencies or practices that resulted in probation, does not respond to a letter of advisement, or is found otherwise to be seriously out of compliance with the accreditation standards or policies, it may be requested to show why its accreditation should not be withdrawn at the end of a stated period. The request to show cause is made by certified letter to the school director and program dean/director (and/or other representatives of the school), with a copy to the chair of the school’s governing board or the school owner. The burden of proof is on the program to demonstrate to the NAMAAC why its accreditation should be continued beyond the stated period. The letter sets forth the deficiencies upon which the show-cause action is based, specifies the show-cause period, and requests submission of a focused report and, optionally, an onsite visit by a specific date. The issuance of a show-cause letter is a public sanction.

The NAMAAC judges the nature and severity of the situation in determining whether to issue a letter of advisement, impose probation, or issue a show-cause letter. While the three sanctions are of increasing severity, they are not necessarily applied in sequence. The NAMAAC may apply any sanction at any time, with the requirement that the program correct the cited deficiency or circumstance within a stated period, not to exceed two years. If multiple sanctions are imposed on a program, the total time that the program has to satisfactorily address the sanctions may not exceed two years from the imposition of the first sanction. Accreditation status continues during a period of a sanction. As noted above, while a letter of advisement is not made public, the actions of probation and show cause are published. The program is responsible for any costs associated with addressing a sanction.

The NAMAAC also has the authority to impose a sanction in the context of a hearing on reaffirmation of accreditation. In this case, the NAMAAC may, but is not required, to provide notice of its intended action. Should the NAMAAC consider placing an accredited program on probation or issuing a show-cause letter outside of the context of an accreditation action, it will: (i) inform the program of the sanction it intends to

impose and the deficiencies or circumstances upon which the sanction is being considered, and (ii) provide the program an opportunity to submit a written response at least 15 days prior to date of meeting. In the event that a program's non-compliance with the NAMA's standards and policies poses potential immediate serious harm to students or others, the NAMAAC may forgo notification to the program or provide a shorter notice period. Within ten business days of imposing a sanction the NAMAAC gives the program written reasons for its action. A program may not appeal a decision by the NAMAAC to impose a sanction, as a sanction is not considered an adverse decision.

### **Revocation of Accreditation**

At the end of the time period stated in a show-cause letter, the NAMAAC will revoke the accreditation of a program that has not corrected to the satisfaction of the NAMAAC the deficiencies or circumstances that led to the issuance of the letter. At least 30 days before the meeting date on which the NAMAAC will decide whether to revoke accreditation based on the circumstances or deficiencies identified in the show-cause letter, it will: (i) inform the program of its intended action, and (ii) provide the program an opportunity to submit a written response at least 15 days prior to date of meeting.

If a program or its school is found by a judicial court, or a federal or state agency, to have engaged in fraudulent activity, or if the school loses its authority to operate, the NAMAAC will withdraw accreditation. In such cases, the NAMAAC's procedures for sanctions do not apply, and the terms and conditions set forth in a letter of advisement, a probation decision, or a show-cause letter that the NAMAAC may have issued are nullified.

A program that has its accreditation revoked is not entitled to a refund of any fees or dues it has paid to NAMA. A program interested in regaining accreditation must wait at least one year from the time its accreditation is revoked to apply for accreditation.

## **12. Policy on Representation of a Program's Relationship with NAMA/NAMAAC**

The NAMAAC requires accredited Ayurvedic medicine programs, as well as programs seeking accreditation, to honestly and responsibly represent their association with NAMA/NAMAAC orally and in writing. To this end, the NAMAAC requires programs to adhere strictly to the following practices:

- 1) If a program has applied for accreditation and has been informed by the NAMAAC that its application is ready for review, it may publicize this fact by using the following statement in any of its publications: "(Name of program) has applied for accreditation by NAMA and is currently being evaluated." (Note that a program is not allowed to make any statement or representation about the likelihood of gaining accreditation, such as "It is expected that accreditation will be granted in the near future.")
- 2) The program may refer to itself as being "accredited" only after this status has been conferred by the NAMAAC. It may not describe itself as "fully accredited," since the NAMAAC does not grant partial accreditation. The correct terminology is "accredited."
- 3) In representing its association with NAMA/NAMAAC in publications and on its website, the program must use the following statement: "(Name of program) is accredited by the Accreditation Board of the National Ayurvedic Medical Association. For more information, refer to: <http://www.ayurvedanama.org>."
- 4) Accreditation is granted to an Ayurvedic medicine training program as a whole and not to individual units, courses, or degrees. Therefore, statements such as "this course is accredited" or "this certificate is accredited" are incorrect and must be avoided.
- 5) An accredited program may use a NAMA-supplied accreditation service mark in its publications as long as it maintains its accreditation status. A program may not use the NAMA logo in

publications under any circumstances, unless explicitly allowed under NAMA policy.

A program's ability to abide by these principles of good practice in its public representations is considered by the NAMAAC as an indication of the program's integrity as an educational entity. If a program, as determined by the NAMAAC, the NAMA Board, the NAMA Executive Director, the NAMA President, or the NAMAAC Administrator, releases incorrect or misleading information about its accreditation or applicant status with the NAMA, or about any accreditation action, the NAMAAC notifies the program to immediately provide for the public correction of the information, or the NAMAAC so provides. If the program continues to publish incorrect or misleading information, the NAMAAC may initiate an action against the program in accordance with its Policy on Sanctions.

### **13. Policy on Annual Reports**

An accredited Ayurvedic medicine program is required to submit an annual report to the NAMAAC on a form supplied by the NAMAAC by a date specified by the NAMAAC. The annual report form is emailed to each program. The NAMAAC reviews annual reports in order to ensure each program's ongoing compliance with accreditation standards and policies, monitor programs' progress in addressing outstanding deficiencies, and to become aware of any significant changes or trends that may adversely affect an individual program's ability to remain in compliance with accreditation standards and policies. Note, however, that certain types of major changes—referred to as substantive changes—must be reported in accordance with Policy #6 above.

### **14. Policy on Institutional Compliance with Title IV of the HEA**

For each institution that provides financial aid under Title IV of the HEA, the NAMAAC maintains a record of compliance of the institution's program responsibilities under Title IV, based on the most recent student loan default rate data provided by the Secretary of Education, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the NAMAAC.

### **15. Policy on Online and Distance Education**

In order to ensure the academic integrity of an accredited program that is offered in part utilizing an online/distance learning delivery format, the institution/program complies with the following requirements:

- 1) Distance/online learning is appropriate to and consistent with the institution's and program's mission.
- 2) There is effective academic oversight of distance/online learning.
- 3) The institution evaluates the effectiveness of the curriculum components offered using a distance/online learning format—including the extent to which the learning goals are achieved—and uses the results of its evaluations to improve quality.
- 4) Faculty responsible for delivering distance/online instruction and evaluating the students' success in achieving the distance/online learning goals are appropriately qualified and trained, and are effectively supported.
- 5) The institution provides sufficient financial, personnel, equipment and other relevant and necessary resources and services to support a distance/online instruction, including appropriate student, academic and library/information services.
- 6) There must be processes in place through which the institution establishes that the student who registers in a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit. This requirement will be deemed to have been met if the institution:

- i. Verifies the identity of a student who participates in class or coursework by using—at the option of the institution—methods such as (i) a secure login and pass code, (ii) proctored examinations, and/or (iii) new or other technologies and practices that are effective in verifying student identity; and
- ii. Makes clear in writing that institution uses processes that protect student privacy, and notifies students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.

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